

1 LOUIS R. MILLER (State Bar No. 54141)  
smiller@millerbarondess.com  
2 JASON H. TOKORO (State Bar No. 252345)  
jtokoro@millerbarondess.com  
3 STEVEN G. WILLIAMSON (State Bar No. 343842)  
swilliamson@millerbarondess.com  
4 MILLER BARONDESS, LLP  
2121 Avenue of the Stars, Suite 2600  
5 Los Angeles, California 90067  
Tel.: (310) 552-4400 | Fax: (310) 552-8400

6 Attorneys for Defendants

7  
8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**  
10

11 ALEX VILLANUEVA,

12 Plaintiff,

13 v.

14 COUNTY OF LOS ANGELES,  
COUNTY OF LOS ANGELES  
15 SHERIFF'S DEPARTMENT, LOS  
ANGELES COUNTY BOARD OF  
16 SUPERVISORS, COUNTY EQUITY  
OVERSIGHT PANEL, LOS  
17 ANGELES COUNTY OFFICE OF  
INSPECTOR GENERAL,  
18 CONSTANCE KOMOROSKI,  
MERCEDES CRUZ, ROBERTA  
19 YANG, LAURA LECRIVAIN,  
SERGIO V. ESCOBEDO, RON  
20 KOPPERUD, ROBERT G. LUNA,  
MAX-GUSTAF HUNTSMAN,  
21 ESTHER LIM, and DOES 1 to 100,  
inclusive,

22 Defendants.  
23  
24  
25  
26  
27  
28

**CASE NO. 2:24-cv-04979 SVW (JCx)**

**COMPENDIUM OF EVIDENCE IN  
SUPPORT OF DEFENDANTS'  
MOTION FOR SUMMARY  
JUDGMENT**

*[Filed Concurrently with Notice of  
Motion; Memorandum of Points of  
Points and Authorities; Declarations in  
Support; Notice of Lodging and  
[Proposed] Order]*

Date: May 19, 2025

Time: 1:30 p.m.

Crtrm.: 10A

Assigned to the Hon. Stephen V.  
Wilson, Crtrm. 10A and Magistrate  
Judge Jacqueline Chooljian, Crtrm. 750

Trial Date: June 3, 2025

Defendants hereby submits the following Compendium of Evidence in support of its Motion for Summary Judgment as follows:

**INDEX TO COMPENDIUM OF EVIDENCE**

Exhibit No.	Description	Pg. No.
1.	April 9, 2025 Jason Tokoro letter to Alex DiBona	7-11
2.	January 3, 2025 County's Requests for Admission to Plaintiff (Set One)	12-20
3.	February 3, 2025 Villanueva Responses to RFAs (Set One)	21-27
4.	Relevant excerpts from the February 27, 2025 deposition of Constance Marie Komoroski	28-72
5.	Relevant excerpts from the February 28, 2025 deposition of Plaintiff	73-108
6.	Relevant excerpts from the March 4, 2025 and deposition of Veronica Pawlowski (Vol. I)	109-130
7.	Relevant excerpts from the March 5, 2025 deposition of Christine Diaz-Herrera	131-172
8.	Relevant excerpts from the March 6, 2025 deposition of Ann Devane	173-195
9.	Relevant excerpts from the March 7, 2025 deposition of Max Huntsman	196-213
10.	Relevant excerpts from the March 10, 2025 deposition of Roberta Yang	214-240
11.	Relevant excerpts from the March 21, 2025 deposition of Esther Lim	241-264
12.	Relevant excerpts from the March 25, 2025 deposition of Laura Lecrivain	265-279
13.	Relevant excerpts from the March 26, 2025 deposition of Kyla Coates	280-316
14.	Relevant excerpts from the March 28, 2025 deposition of Ms. Cruz Mercedes Cruz	317-352
15.	Relevant excerpts from the April 4, 2025 and deposition of Veronica Pawlowski (Vol. II)	353-366

MILLER BARONDESS, LLP

ATTORNEYS AT LAW  
2121 AVENUE OF THE STARS, SUITE 2600 LOS ANGELES, CALIFORNIA 90067  
TEL: (310) 552-4400 FAX: (310) 552-8400

Exhibit No.	Description	Pg. No.
16.	Relevant excerpts from the April 14, 2025 deposition of Jonathan Lested	367-390
17.	Relevant excerpts from the April 15, 2025 deposition of Nairi Gevorki	391-409
18.	March 8, 2022 Esther Lim CPOE Report Notification Form, IAB 2558101	410-416
19.	March 8, 2022 Esther Lim CISU Assessment Form	417-420
20.	March 17, 2022 Esther Lim Policy of Equality Report/Notification Form, IAB 2558101	421-426
21.	March 17, 2022 Esther Lim LASD ISU Intake Assessment Form	427-437
22.	June 27, 2022 Administration Investigation Notification, IAB 2558101	438-445
23.	January 4, 2023 Admin Investigation letter to Plaintiff	446-447
24.	January through March 2023 emails between Christine Diaz-Herrera and Plaintiff	448-455
25.	October 2, 2023 IAB Investigative File, IAB 2558101	456-536
26.	October 2, 2023 IAB 2558101 Investigator's Log	537-540
27.	July 28, 2021 Villanueva Facebook Live Recording	541-542
28.	October 6, 2021 Facebook Live Recording	543-544
29.	August 29, 2021 KFI Radio Show Hour 1	545-546
30.	August 29, 2021 KFI Radio Show Hour 2	547-548
31.	October 17, 2023 CEOP memo, IAB IV2558101	549-553
32.	March 9, 2022 Max Huntsman County Policy of Equity Report/Notification Form, IAB 2558097	554-563
33.	March 9, 2022 Max Huntsman CISU Assessment Form	564-567
34.	March 16, 2022 Max Huntsman LASD ISU Intake Assessment Form	568-576
35.	March 17, 2022 Max Huntsman Policy of Equality Report/Notification Form, IAB 2558097	577-582
36.	June 27, 2022 Administrative Investigation Notification to Plaintiff, IAB 2558097	583-588

MILLER BARONDESS, LLP

ATTORNEYS AT LAW  
2121 AVENUE OF THE STARS, SUITE 2600 LOS ANGELES, CALIFORNIA 90067  
TEL: (310) 552-4400 FAX: (310) 552-8400

Exhibit No.	Description	Pg. No.
37.	January 4, 2023 letter from the Department to Plaintiff	589-590
38.	October 2, 2023 IAB Investigative File, IAB 2558097	591-676
39.	October 2, 2023 IAB Investigator's Log, IAB 2558097	677-680
40.	October 21, 2021 Villanueva Tweet Thread	681-683
41.	March 22, 2021 Tweet from @LaCoSheriff_33	684-685
42.	March 26, 2022 Villanueva Facebook Live Recording	686-687
43.	March 29, 2022 Villanueva Facebook Live Recording	688-689
44.	April 26, 2022 Villanueva Live Facebook Recording	690-691
45.	July 13, 2022 Villanueva Facebook Live Recording	692-693
46.	October 26, 2022 Villanueva Facebook Live Recording	694-695
47.	March 5, 2022 Message from Sheriff	696-698
48.	March 6, 2022 KFI Radio Show recording Hour 1	699-700
49.	March 6, 2022 KFI Radio Show recording Hour 2	701-702
50.	April 1, 2022 Los Angeles Times article titled "Editorial: The Villanueva Saga Just Gets Odder and more Destructive"	703-708
51.	April 1, 2022 Los Angeles Times article titled "Sheriff Villanueva Makes Ugly, Unfounded Claim Against County Watchdog"	709-714
52.	Video of the April 1, 2022 Los Angeles Times Editorial Board interview	715-716
53.	October 17, 2023 CEOP memo, IAB 2558097	717-721
54.	July 11, 2022 Plaintiff's letter to Board of Supervisors	722-726
55.	September 21, 2022 Plaintiff's letter to Rob Bonta	727-729
56.	September 21, 2022 Plaintiff's letter to Board of Supervisors	730-732
57.	October 3, 2022 Plaintiff's letter to Board of Supervisors	733-795
58.	October 19, 2022 Plaintiff's letter to Board of Supervisors	796-874
59.	October 26, 2022 Plaintiff's letter to Board of Supervisors	875-950
60.	Plaintiff's Facebook Live sessions as Sheriff	951-952



MILLER BARONDESS, LLP

ATTORNEYS AT LAW  
2121 AVENUE OF THE STARS, SUITE 2600 LOS ANGELES, CALIFORNIA 90067  
TEL: (310) 552-4400 FAX: (310) 552-8400

Exhibit No.	Description	Pg. No.
61.	Plaintiff's Facebook Live sessions from December 2022 through January 30, 2024	953-955
62.	Plaintiff's radio show on CRN Digital Talk Radio titled, "The Resistance With Sheriff Alex Villanueva" between May and September 2023	956-959
63.	November 2, 2023 Public Records Act Request	960-961
64.	December 22, 2023 County response to Public Records Act (without attachments)	962-965
65.	Plaintiff's Facebook Live sessions from January 31, 2024 to present	966-968
66.	January 31, 2024 Facebook Live Recording	969
67.	May 17, 2023 Facebook Live Recording	970
68.	September 25, 2024 Facebook Live Recording	971
69.	December 4, 2024 Facebook Live Recording	972
70.	Max Huntsman Drivers License	973-974
71.	Max Huntsman Passport	975-976
72.	Max Huntsman Attorney License Search	977-978
73.	October 23, 2023 Notification Letter to Max Huntsman	979-981
74.	October 23, 2023 Notification Letter to Esther Lim	982-984
75.	Relevant excerpts from the March 14, 2025 deposition of Commander Escobedo	985-997
76.	February 22, 2025 Plaintiff's cover letter for MTA position	998-1001
77.	February 24, 2025 email from Gary Peterson to Plaintiff re MTA position	1002-1004
78.	April 16, 2024 Villanueva Facebook Live Recording	1005
79.	Max Huntsman Social Security Card	1006-1007

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATED: April 21, 2025

Respectfully Submitted,

MILLER BARONDESS, LLP

By:           /s/ Jason H. Tokoro            
JASON H. TOKORO  
Attorneys for Defendants

MILLER BARONDESS, LLP  
ATTORNEYS AT LAW  
2121 AVENUE OF THE STARS, SUITE 2600 LOS ANGELES, CALIFORNIA 90067  
TEL: (310) 552-4400 FAX: (310) 552-8400

# EXHIBIT 1

MILLER BARONDESS, LLP

ATTORNEYS AT LAW  
2121 AVENUE OF THE STARS  
26TH FLOOR  
LOS ANGELES, CALIFORNIA 90067  
TEL: (310) 552-4400  
FAX: (310) 552-8400  
WWW.MILLERBARONDESS.COM

April 9, 2025

JASON H. TOKORO  
DIRECT DIAL: (310) 552-5226  
JTOKORO@MILLERBARONDESS.COM

VIA ELECTRONIC MAIL ONLY

Alex DiBona  
SHEGERIAN & ASSOCIATES, INC.  
11520 San Vicente Boulevard  
Los Angeles, CA 90049  
Email: ADiBona@shegerianlaw.com

Re: *Alex Villanueva v. County of Los Angeles, et al.*  
USDC Case No. 2:24-cv-04979  
**Meet-and-Confer Re: Defendants' Motion to Dismiss Complaint**

Dear Mr. DiBona:

The letter is sent as a precursor to our April 10, 2025 meet and confer about the County's forthcoming Motion for Summary Judgment regarding Plaintiff's First Amendment claim. As you are aware, the Court bifurcated this case, such that only Plaintiff's First Amendment claim is currently at issue. The County reserves the right to move for summary judgment on Plaintiff's other claims at the appropriate time, if necessary. A summary of our positions is below.

**There is No Genuine Dispute of Material Fact That Neither the Board of Supervisors Nor Sheriff Luna Were Involved**

In his First Amended Complaint ("FAC") and throughout this case, Plaintiff has been adamant that the County Board of Supervisors and Sheriff Luna were involved in the complaints made against him, the investigation into those complaints, and the resulting receipt of a "Do Not Rehire" notation. Plaintiff has conducted 15 fact witness depositions and propounded written discovery and document requests. It has been made abundantly clear that none of the Board of Supervisors or Sheriff Luna had any knowledge of, or any involvement with, the Lim or Huntsman complaints. There is no genuine dispute of material fact to the contrary. Plaintiff cannot rely on his mere allegations at the summary-judgment stage.

**Plaintiff's FAC is Factually Unsupported**

It is Plaintiff's burden to establish a *prima facie* First Amendment case. *Boquist v. Courtney*, 32 F.4th 764, 775 (9th Cir. 2022). He cannot meet his burden. There is no genuine

## MILLER BARONDESS, LLP

Alex DiBona  
April 9, 2025  
Page 2

dispute of material fact that the investigations into Plaintiff's misconduct had nothing to do with his claimed protected speech (i.e. his opposition to Ballot Measures A, J, and R, COVID-19 vaccine mandates, and Fulgent). None of the investigation materials reference those topics, and every single person who was deposed stated that those topics had nothing to do whatsoever with the investigations or their outcome.

Plaintiff cannot point to anything showing, or even suggesting, that his protected speech was the reason for the "Do Not Rehire" notation. And even if he could, any alleged retaliatory animus was not the but-for cause of the notation. Each of the members of the County Equity Oversight Panel testified that their recommendation that Plaintiff receive the notation was based on Plaintiff's harassing and discriminatory statements, which Plaintiff does not deny making. There is simply no genuine dispute of material fact to the contrary.

### **Plaintiff's Claim Against the Governmental Entities Fails Under *Monell***

Governmental entities such as the County and its subdivisions cannot be held liable for the acts of their employees based on *respondeat superior*. *Monell v. Dep't of Soc. Servs. of City of N.Y.*, 436 U.S. 658, 694 (1978). Liability can only attach where a constitutional violation was caused by an official County policy, custom or practice. *See id.*

There is no genuine dispute of material fact that no County policy, practice, or custom caused the harm Plaintiff claims. To the contrary, Plaintiff alleges that he was specifically targeted by the County and treated differently as a part of a smear campaign—the polar opposite of a *Monell* claim. (*See* FAC at 6:20–24.) And Plaintiff himself testified that he was being singled out and harmed in a manner that had not been used against any other Sheriff. Plaintiff's § 1983 claims necessarily fail.

### **The Individual Defendants Are Protected by Qualified Immunity**

"The doctrine of qualified immunity protects government officials from liability for civil damages insofar as their conduct does not violate clearly established statutory or constitutional rights of which a reasonable person would have known." *Longoria v. Pinal Cnty.*, 873 F.3d 699, 704 (9th Cir. 2017) (citation omitted). Qualified immunity applies for several reasons. First, there is no clearly-established constitutional right to be free from receiving a ministerial "Do Not Rehire" stamp on a personnel file. Second, all of the actions taken by any individual defendants in this case were reasonable and in good faith.

Plaintiff cannot point to a single genuine issue of material fact to show that any of the individual defendants were acting in bad faith, unreasonably, or in a manner intended to violate Plaintiff's constitutional rights. This is a textbook qualified immunity case.

**MILLER BARONDESS, LLP**

Alex DiBona  
April 9, 2025  
Page 3

**Plaintiff Lacks Standing**

It is undisputed that Plaintiff has never applied to be rehired by the County. Nor has he sought to become a “consultant” with the Department. There is nothing stopping Plaintiff from applying for any of these positions. In short, Plaintiff cannot continue to maintain that a “Do Not Rehire” notation has prevented him from obtaining County employment without ever having sought such employment in the first place. This is especially true where there is no genuine dispute of material fact that the “Do Not Rehire” notation does not prevent a candidate from being employed, but is merely an administrative flag on a file.

**The County is the Only Proper Defendant**

As discussed previously, Plaintiff is suing the County and 14 other defendants for the same conduct. He does not attempt to separate out any of his allegations among the different defendants. This is improper.

There is no genuine dispute of material fact that all of actions taken in this case by the individual defendants were acting in their official capacity. It is well settled that official capacity claims can only be brought against a governmental entity. *Pierce v. San Mateo Cnty. Sheriff's Dep't*, 232 Cal. App. 4th 995, 1018 (2014); *Kentucky v. Graham*, 473 U.S. 159, 166 (1985) (“an official-capacity suit is, in all respects other than name, to be treated as a suit against the entity”).

The same is true for the County subdivision defendants. Such subdivisions should be dismissed where, as here, a party asserts claims that are identical to those asserted against the entity. *See, e.g., Garcia v. Cnty. of Riverside*, No. EDCV 13–00616–JGB (SPX), 2013 WL 12167913, at \*8 (C.D. Cal. Aug. 1, 2013). Furthermore, “[a] subsidiary of a public entity is not a proper defendant on a § 1983 claim.” *Gordon v. County of Orange*, No. SACV 14-01050-CJC(DFM), 2019 WL 4279036, at \*8 (C.D. Cal. Aug. 5, 2019), *aff'd in part, rev'd in part and remanded*, 6 F.4th 961 (9th Cir. 2021); *see also Solesbee v. County of Inyo*, No. 1:13-CV-1548 AWI JLT, 2014 WL 3890680, at \*2 (E.D. Cal. Aug. 7, 2014) (“When a subdivision of a county is sued, the suit is construed as being against the county; the subdivision is not a proper party defendant.”).

Plaintiff’s insistence to keep needless defendants in the case without any factual support is unreasonably vexatious and is done for no other purpose than to harass and multiply proceedings. As we have advised you previously, if the County prevails, it intends to seek fees and costs pursuant to 28 U.S.C. § 1927, and under whatever avenues to which it may be entitled.

We look forward to discussing these issues, and reserve the right to make additional arguments in support of our Motion as necessary.



MILLER BARONDESS, LLP

Alex DiBona  
April 9, 2025  
Page 4

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Tokoro", with a stylized flourish at the end.

Jason H. Tokoro

JHT

# EXHIBIT 2

1 LOUIS R. MILLER (State Bar No. 54141)  
smiller@millerbarondess.com  
2 JASON H. TOKORO (State Bar No. 252345)  
jtokoro@millerbarondess.com  
3 STEVEN G. WILLIAMSON (State Bar No. 343842)  
swilliamson@millerbarondess.com  
4 MILLER BARONDESS, LLP  
2121 Avenue of the Stars, Suite 2600  
5 Los Angeles, California 90067  
Tel.: (310) 552-4400 | Fax: (310) 552-8400  
6

7 Attorneys for Defendants

8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**  
10

11 ALEX VILLANUEVA,  
12 Plaintiff,  
13 v.

14 COUNTY OF LOS ANGELES,  
COUNTY OF LOS ANGELES  
15 SHERIFF'S DEPARTMENT, LOS  
ANGELES COUNTY BOARD OF  
16 SUPERVISORS, COUNTY EQUITY  
OVERSIGHT PANEL, LOS  
17 ANGELES COUNTY OFFICE OF  
INSPECTOR GENERAL,  
18 CONSTANCE KOMOROSKI,  
MERCEDES CRUZ, ROBERTA  
19 YANG, LAURA LECRIVAIN,  
SERGIO V. ESCOBEDO, RON  
20 KOPPERUD, ROBERT G. LUNA,  
MAX-GUSTAF HUNTSMAN,  
21 ESTHER LIM, and DOES 1 to 100,  
inclusive,

22 Defendants.  
23  
24  
25  
26  
27  
28

**CASE NO. 2:24-cv-04979 SVW (JCx)**

**DEFENDANT COUNTY OF LOS  
ANGELES' REQUESTS FOR  
ADMISSION TO PLAINTIFF ALEX  
VILLANUEVA (SET ONE)**

Assigned to the Hon. Stephen V.  
Wilson and Magistrate Judge Jacqueline  
Chooljian

Trial Date: June 3, 2025

710389.1

DEFENDANT COUNTY OF LOS ANGELES' REQUESTS FOR ADMISSION TO PLAINTIFF ALEX  
VILLANUEVA (SET ONE)

MILLER BARONDESS, LLP

ATTORNEYS AT LAW

2121 AVENUE OF THE STARS, SUITE 2600 LOS ANGELES, CALIFORNIA 90067  
TEL: (310) 552-4400 FAX: (310) 552-8400

Pursuant to Rule 36 of the Federal Rules of Civil Procedure, Defendant County of Los Angeles (“Defendant” or “the County”) by and through its attorneys, Miller Barondess, LLP, hereby requests that Plaintiff Alex Villanueva respond to these Requests for Admission (“Requests”), in writing within thirty (30) days.

### **DEFINITIONS**

1. The terms “COMMUNICATION,” “COMMUNICATIONS” and “COMMUNICATE” mean any communication, whether oral, written, or any other action intended to communicate any meaning, including, but not limited to, both: (a) verbal COMMUNICATIONS, whether made in PERSON or by telephone, audio recording, or other means; and (b) written COMMUNICATIONS, including internal emails and correspondence, letters, facsimiles, electronic mail, text messages, direct messages via any online portal or website, and telegraphs.

2. The “COUNTY” means the County of Los Angeles, its employees, agents, or representatives acting on its behalf, excluding counsel representing any COUNTY DEFENDANT.

3. The term “DEFENDANTS” means COUNTY OF LOS ANGELES, COUNTY OF LOS ANGELES SHERIFF’S DEPARTMENT, LOS ANGELES COUNTY BOARD OF SUPERVISORS, COUNTY EQUITY OVERSIGHT PANEL, LOS ANGELES COUNTY OFFICE OF INSPECTOR GENERAL, CONSTANCE KOMOROSKI, MERCEDES CRUZ, ROBERTA YANG, LAURA LECRIVAIN, SERGIO V. ESCOBEDO, RON KOPPERUD, ROBERT G. LUNA, MAX HUNTSMAN, ESTHER LIM, individually or collectively.

4. The terms “DOCUMENT” and “DOCUMENTS” shall be construed under the broadest possible construction under the Federal Rules of Civil Procedure and shall include without limitation COMMUNICATIONS, as well as written, recorded, graphic, or other matter whether sent or received or made or used internally, however produced or reproduced and whatever the medium on which it was produced or reproduced (whether on paper, cards, charts, files, or printouts;

710389.1

2

DEFENDANT COUNTY OF LOS ANGELES’ REQUESTS FOR ADMISSION TO PLAINTIFF ALEX VILLANUEVA (SET ONE)

MILLER BARONDESS, LLP  
ATTORNEYS AT LAW  
2121 AVENUE OF THE STARS, SUITE 2600 LOS ANGELES, CALIFORNIA 90067  
TEL: (310) 552-4400 FAX: (310) 552-8400

1 tapes, discs, belts, video tapes, audiotapes, tape recordings, cassettes, or other types  
2 of voice recording or transcription; computer tapes, databases, e-mails; pictures,  
3 photographs, slides, films, microfilms, motion pictures; or any other medium), and  
4 any other tangible item or thing of readable, recorded, or visual material of whatever  
5 nature, including without limitation originals, drafts, and all non-identical COPIES  
6 of each document (which, by reason of any variation, such as the presence or  
7 absence of handwritten notes or underlining, represents a distinct version). By way  
8 of example, the term “documents” as used herein shall include without limitation:  
9 correspondence; blueprints; memoranda; notes; diaries; letters; telegraphs;  
10 telegrams; telexes; emails; minutes; agendas; contracts; reports; studies; checks;  
11 statements; receipts; returns; summaries; pamphlets; circulars; press releases;  
12 advertisements; books; inter-office and intraoffice COMMUNICATIONS;  
13 handwritten or typewritten notes; notations or summaries of telephone  
14 conversations, meetings, or conferences; bulletins; computer printouts; databases;  
15 teletypes; telefax; invoices; worksheets; photographs; tape recordings; and all other  
16 tangible items of readable, recorded, or visual material of any kind.

17 5. The terms “PERSON” shall mean and refer to any natural individual,  
18 corporation, firm, partnership, proprietorship, association, business, governmental  
19 entity, joint venture, board, authority, commission, agency, or other organization.

20 6. The terms “YOU” and “YOUR” shall mean and refer to Plaintiff Alex  
21 Villanueva, individually.

22 7. The term “FAC” shall mean the operative First Amended Complaint  
23 YOU filed in this LAWSUIT.

24 8. The term “LAWSUIT” shall mean this action, styled as *Villanueva v.*  
25 *County of Los Angeles, et al.*, Case No. 2:24-cv-04979 SVW (JCx), in the United  
26 States District Court for the Central District of California.

MILLER BARONDESS, LLP  
ATTORNEYS AT LAW  
2121 AVENUE OF THE STARS, SUITE 2600 LOS ANGELES, CALIFORNIA 90067  
TEL: (310) 552-4400 FAX: (310) 552-8400

1 9. The term "HUNTSMAN INVESTIGATION" shall mean the  
2 COUNTY'S investigation into the County Policy of Equity Complaint filed against  
3 YOU by Max Huntsman, as alleged in YOUR FAC.

4 10. The term "LIM INVESTIGATION" shall the COUNTY'S  
5 investigation into the County Policy of Equity Complaint filed against YOU by  
6 Esther Lim, as alleged in YOUR FAC.

7 **INSTRUCTIONS**

8 1. Unless you properly object to a Request, YOU must, under Federal  
9 Rule of Civil Procedure 36, admit, specifically deny, or state in detail why YOU  
10 cannot truthfully admit or deny each of the following Requests based on knowledge  
11 and information in YOUR possession, custody or control, or in the possession,  
12 custody or control of your representatives, agents, or attorneys. If you do not  
13 respond to each of these Requests within thirty (30) days, the Requests will be  
14 deemed admitted under Federal Rule of Civil Procedure 36.

15 2. If YOU object to or refuse to answer any Request for Admission on the  
16 ground that the answer reflects or would reveal the substance of a confidential or  
17 privileged communication, IDENTIFY:

18 (a) the nature of the privilege claimed;

19 (b) the PERSON who made the COMMUNICATION, whether oral  
20 or in writing;

21 (c) if the COMMUNICATION was oral, all PERSONS present  
22 during the COMMUNICATION;

23 (d) if the COMMUNICATION was written, the author, addressees,  
24 and any other recipients;

25 (e) the relationship of the author of the COMMUNICATION to each  
26 recipient;

27 (f) the relationship of the PERSONS present to the PERSON who  
28 made the COMMUNICATION;



MILLER BARONDESS, LLP

ATTORNEYS AT LAW  
2121 AVENUE OF THE STARS, SUITE 2600 LOS ANGELES, CALIFORNIA 90067  
TEL: (310) 552-4400 FAX: (310) 552-8400

- 1 (g) the date and place of the COMMUNICATION;  
2 (h) the general subject matter of the COMMUNICATION; and  
3 (i) other information sufficient to enable a full assessment of the  
4 applicability of the privilege claims, as required by Federal Rule of Civil Procedure  
5 26(b)(5), and the Court's local rules.

6 3. These Requests for Admission are continuing in nature. If YOU  
7 receive or otherwise become aware of information that would change YOUR answer  
8 to ANY of these Requests for Admission after YOU have served YOUR response,  
9 YOU must comply with Federal Rules of Civil Procedure 26(e) and 36(b) by  
10 promptly supplementing YOUR answers or filing the appropriate motion.

11 **REQUESTS FOR ADMISSION**

12 **REQUEST FOR ADMISSION NO. 1:**

13 Admit that YOU have never spoken to Max Huntsman regarding Ballot  
14 Measure J.

15 **REQUEST FOR ADMISSION NO. 2:**

16 Admit that YOU have never spoken to Max Huntsman regarding Ballot  
17 Measure R.

18 **REQUEST FOR ADMISSION NO. 3:**

19 Admit that YOU have never spoken to Max Huntsman regarding Ballot  
20 Measure A.

21 **REQUEST FOR ADMISSION NO. 4:**

22 Admit that YOU have never spoken to Max Huntsman regarding Fulgent  
23 Genetics.

24 **REQUEST FOR ADMISSION NO. 5:**

25 Admit that YOU have never spoken to Max Huntsman regarding the  
26 COUNTY'S COVID-19 vaccine mandates.

27 **REQUEST FOR ADMISSION NO. 6:**

28 Admit that YOU have never spoken to Esther Lim regarding Ballot Measure

710389.1

5

DEFENDANT COUNTY OF LOS ANGELES' REQUESTS FOR ADMISSION TO PLAINTIFF ALEX  
VILLANUEVA (SET ONE)

MILLER BARONDESS, LLP  
ATTORNEYS AT LAW  
2121 AVENUE OF THE STARS, SUITE 2600 LOS ANGELES, CALIFORNIA 90067  
TEL: (310) 552-4400 FAX: (310) 552-8400

1 J.

2 **REQUEST FOR ADMISSION NO. 7:**

3 Admit that YOU have never spoken to Esther Lim regarding Ballot Measure

4 R.

5 **REQUEST FOR ADMISSION NO. 8:**

6 Admit that YOU have never spoken to Esther Lim regarding Ballot Measure

7 A.

8 **REQUEST FOR ADMISSION NO. 9:**

9 Admit that YOU have never spoken to Esther Lim regarding Fulgent  
10 Genetics.

11 **REQUEST FOR ADMISSION NO. 10:**

12 Admit that YOU have never spoken to Esther Lim regarding the COUNTY'S  
13 COVID-19 vaccine mandates.

14 **REQUEST FOR ADMISSION NO. 11:**

15 Admit that YOU have never spoken to any member of the County Equity  
16 Oversight Panel regarding Ballot Measure J.

17 **REQUEST FOR ADMISSION NO. 12:**

18 Admit that YOU have never spoken to any member of the County Equity  
19 Oversight Panel regarding Ballot Measure R.

20 **REQUEST FOR ADMISSION NO. 13:**

21 Admit that YOU have never spoken to any member of the County Equity  
22 Oversight Panel regarding Ballot Measure A.

23 **REQUEST FOR ADMISSION NO. 14:**

24 Admit that YOU have never spoken to any member of the County Equity  
25 Oversight Panel regarding Fulgent Genetics.

26 **REQUEST FOR ADMISSION NO. 15:**

27 Admit that YOU have never spoken to any member of the County Equity  
28 Oversight Panel regarding the COUNTY'S COVID-19 vaccine mandates.

710389.1

6

DEFENDANT COUNTY OF LOS ANGELES' REQUESTS FOR ADMISSION TO PLAINTIFF ALEX  
VILLANUEVA (SET ONE)

MILLER BARONDESS, LLP

ATTORNEYS AT LAW  
2121 AVENUE OF THE STARS, SUITE 2600 LOS ANGELES, CALIFORNIA 90067  
TEL: (310) 552-4400 FAX: (310) 552-8400

**REQUEST FOR ADMISSION NO. 16:**

Admit that, from January 31, 2024 to January 3, 2025, YOU have not received any mental health treatment for any emotional distress, severe or otherwise, that you allege to have suffered in YOUR FAC.

**REQUEST FOR ADMISSION NO. 17:**

Admit that, from January 31, 2024 to January 3, 2025, YOU have not received any medical treatment for any emotional distress, severe or otherwise, that you allege to have suffered in YOUR FAC.

DATED: January 3, 2025

MILLER BARONDESS, LLP

By: /s/ Steven G. Williamson  
STEVEN G. WILLIAMSON  
Attorneys for Defendants

**CERTIFICATE OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 2121 Avenue of the Stars, Suite 2600, Los Angeles, CA 90067.

On January 3, 2025, I served true copies of the following document(s) described as:

**DEFENDANT COUNTY OF LOS ANGELES' REQUESTS FOR  
ADMISSION TO PLAINTIFF ALEX VILLANUEVA (SET ONE)**

on the interested parties in this action as follows:

Carney R. Shegerian

Mahru Madjidi

John David

Alex DiBona

SHEGERIAN & ASSOCIATES, INC.

11520 San Vicente Boulevard

Los Angeles, CA 90049

*Attorneys for Plaintiff*

ALEX VILLANUEVA

Tel.: (310) 860-0770

Fax: (310) 860-0771

Email: CShegerian@Shegerianlaw.com

MMadjidi@Shegerianlaw.com

JDavid@Shegerianlaw.com

YCardoza@Shegerianlaw.com

ADiBona@shegerianlaw.com

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address swilliamson@millerbarondess.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on January 3, 2025, at Los Angeles, California.

/s/ Steven G. Williamson

Steven G. Williamson

# EXHIBIT 3

Carney R. Shegerian, Esq., State Bar No. 150461  
CShegerian@Shegerianlaw.com  
Mahru Madjidi Esq., State Bar No. 297906  
MMadjidi@Shegerianlaw.com  
Alex DiBona. State Bar No. 265744  
ADiBona@shegerianlaw.com  
SHEGERIAN & ASSOCIATES, INC.  
11520 San Vicente Boulevard  
Los Angeles, California 90049  
Telephone Number: (310) 860-0770  
Facsimile Number: (310) 860-0771

Attorneys for Plaintiff,  
ALEX VILLANUEVA

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

ALEX VILLANUEVA,

Plaintiff,

vs.

COUNTY OF LOS ANGELES,  
COUNTY OF LOS ANGELES  
SHERIFF'S DEPARTMENT, LOS  
ANGELES COUNTY BOARD OF  
SUPERVISORS, COUNTY EQUITY  
OVERSIGHT PANEL, LOS  
ANGELES COUNTY OFFICE OF  
INSPECTOR GENERAL,  
CONSTANCE KOMOROSKI,  
MERCEDES CRUZ, ROBERTA  
YANG, LAURA LECRIVAIN,  
SERGIO V. ESCOBEDO, RON  
KOPPERUD, ROBERT G. LUNA,  
MAX-GUSTAF HUNTSMAN,  
ESTHER LIM, and DOES 1 to 100  
inclusive,

Defendants.

Case No.: 2:24-cv-04979 SVW (JC)

**The Honorable Stephen V. Wilson and  
Magistrate Judge Jacqueline Chooljian**

**PLAINTIFF ALEX VILLANUEVA'S  
OBJECTIONS AND RESPONSES TO  
REQUEST FOR ADMISSION**

Trial Date: June 3, 2025  
Action Filed: June 13, 2024

**REQUEST FOR ADMISSION NO. 1**

**Admit that YOU have never spoken to Max Huntsman regarding Ballot Measure J.**

Response: Plaintiff objects that this Request for Admission is premature, overbroad, burdensome, calls for attorney work product/attorney-client privileged information, and



1 calls for information outside of Plaintiff's personal knowledge. Plaintiff further objects that  
2 this Request for Admission is phrased in a manner to circumvent the limits of discovery  
3 under the FRCP. Subject to and without waiving these objections, Plaintiff cannot recall  
4 any direct and/or in-person communication with Max Huntsman regarding Ballot Measure  
5 J. However, Plaintiff believes Huntsman was aware of his public statements regarding  
6 Protected Activity as defined in these interrogatories. On or around July 12, 2022, Plaintiff  
7 sent a letter to the entire Board of Supervisors stating that Ballot Measure A would "allow  
8 corrupt Board members to intimidate sheriffs from carrying out their duties to investigate  
9 crime" and that the measure was unconstitutional and illegal. Villanueva's re-election  
10 campaign issued a public statement that the Board of Supervisors had "no business"  
11 seeking authority to remove a Sheriff. On or around February 10, 2020, Plaintiff, through  
12 the Los Angeles County Sheriff's Office, emailed Ballotpedia regarding Ballot Measure R,  
13 stating that the measure would lead to unnecessary lawsuits and politically motivated  
14 oversight. On or around July 22, 2020, Plaintiff warned on social media that the passage  
15 of Ballot Measure J would result in de facto cuts to law enforcement budgets, leading to  
16 patrol station closures, officer layoffs, and a dystopian future resembling "a scene from  
17 Mad Max." On or around August 5, 2020, Villanueva publicly stated that while he supports  
18 mental health and substance abuse programs, the proposal aimed to defund law  
19 enforcement. On or around November 29, 2021, Villanueva sent a letter to the Board of  
20 Supervisors stating that the Los Angeles Sheriff's Department would not use Fulgent  
21 Genetics Corporation due to concerns about DNA data being shared with the Republic of  
22 China. On or around October 21, 2021, Villanueva publicly stated on a nationally watched  
23 cable news program that he would not enforce the Board of Supervisors' vaccine mandate,  
24 citing concerns over staff retention and public safety impact. Villanueva regularly provided  
25 public statements and letters to the Board of Supervisors and directly addressed them  
26 during their weekly public meetings, including opposition to Ballot Measures A, R, and J,  
27  
28

1 as well as vaccine mandates. Discovery is continuing.

2 **REQUEST FOR ADMISSION NO. 2**

3 **Admit that YOU have never spoken to Max Huntsman regarding Ballot Measure R.**

4 Response: Plaintiff objects that this Request for Admission is premature, overbroad,  
5 burdensome, calls for attorney work product/attorney-client privileged information, and  
6 calls for information outside of Plaintiff's personal knowledge. Plaintiff further objects that  
7 this Request for Admission is phrased in a manner to circumvent the limits of discovery  
8 under the FRCP. Subject to and without waiving these objections, Plaintiff cannot recall  
9 any direct and/or in-person communication with Max Huntsman regarding Ballot Measure  
10 R but believes Huntsman was aware of his public statements regarding Protected Activity.  
11 Discovery is continuing.

12 **REQUEST FOR ADMISSION NO. 3**

13 **Admit that YOU have never spoken to Max Huntsman regarding Ballot Measure A.**

14 Response: Response: Plaintiff objects that this Request for Admission is premature,  
15 overbroad, burdensome, calls for attorney work product/attorney-client privileged  
16 information, and calls for information outside of Plaintiff's personal knowledge. Plaintiff  
17 further objects that this Request for Admission is phrased in a manner to circumvent the  
18 limits of discovery under the FRCP. Subject to and without waiving these objections,  
19 Plaintiff cannot recall any direct and/or in-person communication with Max Huntsman  
20 regarding Ballot Measure A but believes Huntsman was aware of his public statements  
21 regarding Protected Activity. Discovery is continuing.

22 **REQUEST FOR ADMISSION NO. 4**

23 **Admit that YOU have never spoken to Max Huntsman regarding Fulgent Genetics.**

24 Response: Plaintiff objects that this Request for Admission is premature, overbroad,  
25 burdensome, calls for attorney work product/attorney-client privileged information, and  
26 calls for information outside of Plaintiff's personal knowledge. Plaintiff further objects that  
27 this Request for Admission is phrased in a manner to circumvent the limits of discovery  
28 under the FRCP. Subject to and without waving these objections, Plaintiff cannot recall

1 any direct and/or in-person communication with Max Huntsman regarding Fulgent  
2 Genetics but believes Huntsman was aware of his public statements regarding Protected  
3 Activity. Discovery is continuing.

4 **REQUEST FOR ADMISSION NO. 5**

5 **Admit that YOU have never spoken to Max Huntsman regarding the County's**  
6 **COVID-19 mandates.**

7 Response: Response: Plaintiff objects that this Request for Admission is premature,  
8 overbroad, burdensome, calls for attorney work product/attorney-client privileged  
9 information, and calls for information outside of Plaintiff's personal knowledge. Plaintiff  
10 further objects that this Request for Admission is phrased in a manner to circumvent the  
11 limits of discovery under the FRCP. Subject to and without waiving these objections,  
12 Plaintiff cannot recall any direct and/or in-person communication with Max Huntsman  
13 regarding the County's COVID-19 mandates but believes Huntsman was aware of his  
14 public statements regarding Protected Activity. Discovery is continuing.

15 **REQUEST FOR ADMISSION NO. 16**

16 **Admit that, from January 31, 2024, to January 3, 2025, YOU have not received any**  
17 **mental health treatment for any emotional distress, severe or otherwise, that you**  
18 **allege to have suffered in YOUR FAC.**

19 Response: Plaintiff objects that this Request for Admission is premature, overbroad,  
20 burdensome, calls for attorney work product/attorney-client privileged information, and  
21 calls for information outside of Plaintiff's personal knowledge and calls for expert  
22 testimony. Subject to and without waiving these objections, Plaintiff responds as follows:  
23 Discovery is continuing.

24 **REQUEST FOR ADMISSION NO. 17**

25 **Admit that, from January 31, 2024, to January 3, 2025, YOU have not received any**  
26 **medical treatment for any emotional distress, severe or otherwise, that you allege to**  
27 **have suffered in YOUR FAC.**

28 Response: Plaintiff incorporates by reference the objections stated in Response No. 16.

1 Subject to and without waiving these objections, Plaintiff responds as follows: Discovery  
2 is continuing.

3  
4 Dated: February 3, 2025

SHEGERIAN & ASSOCIATES, INC.

5  
6 By: Alex DiBona  
7 Alex DiBona, Esq.  
8 Attorneys for Plaintiff,  
ALEX VILLANUEVA  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**VILLANUEVA v. COUNTY OF LOS ANGELES, et al. USDC Case No. 2:24-cv-04979 SVW (JC)**

**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I am an employee in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 11520 San Vicente Boulevard Los Angeles, California 90049.

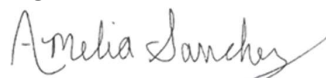
On February 3, 2025, I served the foregoing document, described as “**PLAINTIFF ALEX VILLANUEVA’S OBJECTIONS AND RESPONSES TO REQUEST FOR ADMISSION,**” on all interested parties in this action as follows:

**LOUIS R. MILLER**  
**smiller@millerbarondess.com**  
**JASON H. TOKORO**  
**jtokoro@millerbarondess.com**  
**STEVEN G. WILLIAMSON**  
**swilliamson@millerbarondess.com**  
**MILLER BARONDESS, LLP**  
**2121 Avenue of the Stars, Suite 2600**  
**Los Angeles, California 90067**

☒ **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

☒ **(FEDERAL)** I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on February 3, 2025, at Los Angeles, California.



Amelia Sanchez

# EXHIBIT 4

**CERTIFIED COPY**

**In the Matter Of:**

**ALEX VILLANUEVA vs COUNTY OF LOS ANGELES**

**CONSTANCE MARIE KOMOROSKI, ESQ.**

**February 27, 2025**

**Job No. 6455**

1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA , WESTERN DIVISION

3

4 \_\_\_\_\_ )  
ALEX VILLANUEVA, )  
5 )  
Plaintiff, )  
6 )  
vs. ) Case No.:  
7 ) 2:24-cv-04979 SVW (JCx)  
COUNTY OF LOS ANGELES, COUNTY OF LOS )  
8 ANGELES SHERIFF'S DEPARTMENT, LOS )  
ANGELES COUNTY BOARD OF SUPERVISORS, )  
9 COUNTY EQUITY OVERSIGHT PANEL, LOS )  
ANGELES COUNTY OFFICE OF INSPECTOR )  
10 GENERAL, CONSTANCE KOMOROSKI, MERCEDES )  
CRUZ, ROBERTA YANG, LAURA LECRIVAIN, )  
11 SERGIO V. ESCOBEDO, RON KOPPERUD, ROBERT )  
G. LUNA, MAX GUSTAF HUNTSMAN, ESTHER )  
12 LIM, and DOES 1 to 100, inclusive, )  
 )  
13 Defendants. )  
\_\_\_\_\_ )

14

15

16

17 Videoconference Deposition of  
18 CONSTANCE MARIE KOMOROSKI, ESQ., taken on  
19 behalf of Plaintiff, Remote Via Zoom, beginning  
20 at 10:07 a.m., Thursday, February 27, 2025,  
21 before Cila Meyer, No. 4914, a Certified  
22 Shorthand Reporter.

23

24

25



1 APPEARANCES OF COUNSEL:

2

3 For the Plaintiff:

4 ALEX DiBONA, ATTORNEY AT LAW  
5 ANNA KHACHATRY, ATTORNEY AT LAW  
6 SHEGERIAN & ASSOCIATES, INC.  
7 11520 San Vicente Boulevard  
8 Los Angeles, California 90049  
9 310.860.0770  
10 adibona@shegerianlaw.com  
11 akhachatry@shegerianlaw.com  
12

13 For the Defendants:

14 JASON H. TOKORO, ATTORNEY AT LAW  
15 STEVEN WILLIAMSON, ATTORNEY AT LAW  
16 MILLER BARONDESS, LLP  
17 2121 Avenue of the Stars  
18 Suite 2600  
19 Los Angeles, California 90067  
20 jtokoro@millerbarondess.com  
21 swilliamson@millerbarondess.com  
22  
23  
24  
25

1 what your assignment was?

2 A When did it convene? What's convene?

3 Q When the three person -- I'll rephrase it.

4 When the three-person panel was formed, what

5 you personally, what did you understand the CEOP was to

6 do?

7 A If we are -- if a panelist is on the calendar

8 for briefing and it involves the sheriff's department,

9 at some point, 10 days to two weeks prior to the

10 briefing date, the panelist will be sent an invitation

11 by a system called Sharepoint, one word, to review the

12 investigation and accompanying documents.

13 Should I continue?

14 Q Yes. If you unders- -- if you're still

15 answering my question, then, yes, you're entitled to

16 give a complete answer.

17 A After each panelist has completed an initial

18 review of the investigation, probably -- well, strike

19 probably, but they will decide as a group -- if one of

20 the panel believes it should be presented to the

21 department as opposed to deciding with the department

22 not having to appear and making -- no -- recommending --

23 recommendation without the department appearing, then we

24 will tell the department to keep it on calendar for

25 briefing. Then each panelist will conduct their review

1 of the investigation pending the pre briefing on the  
2 date of the briefing.

3 Q You've used the term -- I think you said "keep  
4 it on calendar for briefing."

5 In the context you're using it, what does it  
6 mean to brief a matter?

7 A For the sheriff's department?

8 Q Yes.

9 A For the sheriff's department it means to appear  
10 by WebEx, which is sheriff zoom, with the other two  
11 panelists and department representatives, a small number  
12 of department representatives initially for a  
13 pre briefing, which takes place on the half an hour to  
14 an hour before the briefing itself. Then, having gained  
15 an understanding of additional questions or opinions  
16 from the department representatives, all the  
17 panelists -- the three panelists, those representatives,  
18 and the departmental representatives of -- for that  
19 particular employee, subject employee, subject, not the  
20 complaining party, appear at a briefing along with  
21 representatives from civil rights, employee relations,  
22 county counsel, and others.

23 Q Then what does the actual briefing entail?

24 A The actual briefing, the designated chair  
25 introduces the name and IAB number of the case -- well,

1 first, the technical administrator of the sheriff's  
2 department does a roll call, so that each individual on  
3 the call or on the WebEx is identified. There's  
4 typically 10, more or less, departmental representatives  
5 in addition to the panel. Then the chair of the panel  
6 introduces the subject. Each panelist is given an  
7 opportunity to articulate questions and give a proposed  
8 recommendation as to whether the allegation or  
9 allegations are founded, unfounded, or unresolved, and  
10 then requests a response from the department.

11 Q I think I know, but what does "founded" mean in  
12 the context you're using it?

13 A Founded means that it's the panel's  
14 recommendation that the subject be found to have engaged  
15 in the policy violation -- engaged in conduct that  
16 violates the policy, I should say.

17 Q What does "unfounded" mean in the context  
18 you're using it?

19 A That it's more likely than not that the  
20 individual did not engage in conduct that violates the  
21 policy or engaged in conduct that might have been  
22 misconduct, but it didn't involve the policy.

23 Q I think you used a third term. You said  
24 "founded, unfounded," or is it "unresolved"?

25 A Yes.

1 Q In the context you're using it, what does  
2 "unresolved" mean?

3 A Unresolved is a gray term like inconclusive  
4 where -- there are a lot of potential examples for  
5 unresolved. It may be -- it may involve corroboration.  
6 It may involve credibility. Something that can't be  
7 solved at the briefing.

8 Q Is it fair to say that "unresolved" means, at  
9 least as you use it, that there can't be a determination  
10 whether the allegation is either founded or unfounded  
11 for the various reasons you identified?

12 A Yes.

13 Q One of those reasons, just to take an example,  
14 mean there may be credibility issues on both sides that  
15 make it unable to be founded or unfounded.

16 Is that a fair characterization of what you  
17 said?

18 A Um. Yes. It's more likely that there's just  
19 not sufficient information or -- the term evidence is  
20 not appropriate for this venue, but support.

21 Q When you say "the term evidence is not  
22 appropriate for this venue, but support" is, can you  
23 just explain how you're differentiating "evidence" from  
24 "support" in the context of the CEOP panel?

25 A Yes. The support may involve whether the

1 guidance taken after the briefing?

2 A At the briefing.

3 Q At the briefing. Did the CEOP adopt  
4 recommendations and guidance at the briefing?

5 MR. TOKORO: Objection; vague and ambiguous,  
6 misstates the purpose of the CEOP.

7 THE DEPONENT: The briefing is concluded when  
8 the chair confirms the recommendations the panel has  
9 arrived at, verbally confirms the recommendations the  
10 panel has arrived at with the assistance of the  
11 interactive process in the department.

12 BY MR. DiBONA:

13 Q Were there recommendations adopted by the  
14 panel?

15 MR. TOKORO: Same objection.

16 THE DEPONENT: The panel does not adopt  
17 recommendations.

18 BY MR. DiBONA:

19 Q Were there recommendations given by the panel?

20 A Yes.

21 Q What were those recommendations?

22 A I don't recall specifically, but I know from  
23 reviewing the stacked report, that the panel recommended  
24 f- -- findings of founded. And on this investigation I  
25 believe they were all founded. I don't recall.

1 Q What is the stacked report?

2 A It's the written report. That's a -- it's just

3 I don't know where the term comes from. It's called

4 stacked report. It's just a written report.

5 Q Did the panel have any other recommendations,  
6 to your recollection?

7 A The panel recommended that if the employee, the  
8 subject were still with the County, they would issue  
9 some -- I don't remember what it was, whether it was a  
10 suspension of a couple of days or something. But that  
11 since the employee was no longer with the county, they  
12 recommended a note on top of the file for human  
13 resources.

14 Q And what was the note -- what was the note on  
15 top of the file that was recommended?

16 A The note is typically a tool called, "Do not  
17 rehire," which is meant to guide human resources to look  
18 below the note to see whether there were issues  
19 involving potential discipline, should the employee  
20 elect to return either as an employee or as a  
21 contractor.

22 Q And -- excuse me. When you say that there  
23 was -- strike that.

24 Did you say that there was a chair present at  
25 the briefing?

1 A I was the administrative chair for the panel,  
2 selected at random by the calendaring staff.

3 Q And what is the role of the chair, to your  
4 understanding?

5 A The vote doesn't count anymore and there is no  
6 authority. It's just someone tasked with the steering  
7 of the discussion, making sure it stays on schedule.

8 Q And why did you believe it would have been  
9 appropriate, had Sheriff Villanueva still been employed  
10 at the County, for there to be a suspension?

11 A Well, if, as I recall, the panel with the  
12 department's assistance and input decided that the  
13 allegations were founded, the penalties under the policy  
14 for violating the policy would have included days off  
15 suspension.

16 Q Any other reason other than that?

17 A That's the whole reason.

18 Q And why did you believe it was appropriate to  
19 recommend "Do not rehire" recommendation?

20 A The "Do not rehire" note is a tool used  
21 whenever an employee who has been brought before a panel  
22 for alleged policy violations is found to -- either a  
23 finding of founded or in non sheriff it's  
24 substantiated -- so that HR knows to look underneath the  
25 note for their evaluation of the fitness or the



1 suitability of the employee if they return as an  
2 employee or as a contractor.

3 Q Why -- why did you believe the charge of  
4 harassment on the basis of race or national origin was  
5 founded?

6 A It's not a unilateral recommendation with the  
7 assistance of the copanelists and the department's input  
8 during the interactive process. The panel as a whole  
9 arrived at that recommendation.

10 Q I understand. But why did you -- but you  
11 agreed with that, I assume. Sorry.

12 You agreed with the finding that there was  
13 harassment on the basis of race and national origin; is  
14 that right?

15 A Based on the totality of the circumstances,  
16 including the information in the report, the  
17 availability of confirming video evidence, the  
18 transcripts, and the relationship of the subject to the  
19 department, those would have influenced my agreement  
20 with that recommendation.

21 Q What about the totality of the circumstances  
22 led you to believe that Sheriff Villanueva was harassing  
23 Max Huntsman on the basis of his race?

24 A I would refer to the report.

25 Q So just to be clear, as you sit here today, do

1 Q Understood. But just want to make that clear.

2 One of the -- what -- what I am asking,

3 Ms. Komoroski, is for your opinion why did you believe

4 under the totality of the circumstances Sheriff

5 Villanueva harassed Max Huntsman on the basis of race?

6 A After discussion at the briefing, pre briefing

7 and briefing with the panelists in the department, we

8 accepted sufficient number of the articulated policy

9 violations in the report to support a recommendation

10 that it was founded.

11 Q What about what was said led you to believe

12 there was harassment based on race?

13 A I would have to look at the report.

14 Q Do you see the report on your screen?

15 A Not yet.

16 Q It should come up. Do you see it on your

17 screen now?

18 A I do not.

19 Q Okay. One moment. Sorry about that.

20 A Here you go.

21 Q Okay. There we go. Do you see the report that

22 was previously marked as Exhibit 2?

23 A Yes.

24 Q Let me just go down to it's page COLA 2047,

25 "Sheriff Villanueva's Alleged Harassment."

1 Do you see that?

2 A Yes.

3 Q And, again, it's obvious looking at it, but  
4 just so the record is clear, it's two paragraphs long.

5 Is that what you see?

6 A Yes.

7 Q The first one is the reference to Sheriff  
8 Villanueva referring to Max Huntsman as Max Gustaf with  
9 an f or Max Gustaf with a v; is that right?

10 A That's what I'm reading.

11 Q And why do you believe, based on the totality  
12 of the circumstances, that Sheriff Villanueva referring  
13 to Max Huntsman as Max Gustaf is harassing on the basis  
14 of race or national origin?

15 MR. TOKORO: Objection; incomplete.

16 THE DEPONENT: (No audible response)

17 BY MR. DiBONA:

18 Q I'm sorry, Ms. Komoroski. If you answered my  
19 question, I didn't hear it. You may answer.

20 A Oh. I think you'd have to repeat it. I was  
21 waiting for someone else to talk. I apologize.

22 MR. DiBONA: Sure.

23 Ms. Meyer, can you please repeat my -- repeat  
24 my question.

25 (The record was read as requested)

1 THE DEPONENT: It was based on the totality of  
2 the circumstances which include the reference to  
3 Max Gustaf.

4 BY MR. DiBONA:

5 Q What other circumstances does it include?

6 A There was testimony supported -- supported  
7 testimony that Mr. Villanueva referred to Mr. Huntsman  
8 in terms of holocaust denial and published those  
9 statements in his capacity as sheriff or former sheriff  
10 on social media and radio.

11 Q Can you tell me what is it about referring to  
12 Max Huntsman as the name he was born with that  
13 disparages his race or national origin?

14 MR. TOKORO: Again, objection; vague and  
15 ambiguous. Also, misstates the record. And, also,  
16 misstates the statement that's made by Mr. Villanueva.

17 THE DEPONENT: In conjunction with the  
18 holocaust denial statements --

19 BY MR. DiBONA:

20 Q Sorry. Go ahead. Sorry.

21 A -- and his position -- Mr. Villanueva's  
22 position as sheriff. I know that's not a complete  
23 sentence, but I'm trying to respond to your question  
24 about why a year and a half ago the panel determined the  
25 allegation was founded or recommended that the

1 MR. TOKORO: Same objections.

2 THE DEPONENT: I believe there was a holocaust.

3 BY MR. DiBONA:

4 Q Un- -- un- -- understood. But would you agree  
5 with me that denying it is a denial of history?

6 MR. TOKORO: Objection; again, irrelevant.

7 THE DEPONENT: I suppose.

8 BY MR. DiBONA:

9 Q So what about a denial of history has to do  
10 with an individual's race or national origin?

11 MR. TOKORO: Objection; asked and answered  
12 several times now. It also misstates her prior  
13 testimony about why they reached the recommendation.

14 THE DEPONENT: The recommendation was not based  
15 on historical accuracy by any party. It was based on  
16 attributing holocaust denial to Mr. Huntsman,  
17 misarticulation of his name, and denouncing it in a  
18 questioning manner, I suppose, on social media and  
19 radio.

20 BY MR. DiBONA:

21 Q You believe that Sheriff Villanueva  
22 misarticulated Max Huntsman's name?

23 A Yes. And that's what Mr. Huntsman says, I  
24 should say.

25 Q Just to be clear, do you see the sentence under

1 Mr. Huntsman's name, the first sentence says,

2 "Mr. Huntsman was born Max Gustaf Edler"?

3 A I do.

4 Q So Max Gustaf was his first name; correct?

5 A I'm reading the same thing you are.

6 Q So how is Sheriff Villanueva referring to

7 Max Huntsman as the first name he was born under

8 misarticulating his name?

9 MR. TOKORO: Objection; vague and ambiguous.

10 It's also misleading. Does not provide her with the

11 entire context of that testimony under Mr. Huntsman's

12 name.

13 THE DEPONENT: According to the report,

14 Mr. Huntsman goes by Max Huntsman in the County and has

15 done so for many years.

16 BY MR. DiBONA:

17 Q And just to be clear, you believe that that's

18 the basis for saying his name was misarticulated?

19 A According to the report, that's what

20 Mr. Huntsman says.

21 Q And do you agree with that?

22 A I found it persuasive or I wouldn't have joined

23 the panel in making the recommendation that it was part

24 of the totality of the circumstances leading to a

25 recommendation.

1 Q The totality of the circumstances that led you  
2 to believe there was harassment on the basis of race was  
3 misarticulating Max Gustaf's name or Max Gustaf  
4 Huntsman's name and referring to him as a holocaust  
5 denier; is that fair?

6 A In conjunction with the -- Mr. Villanueva's  
7 position and the method of publication of the  
8 statements.

9 Q And what about his position led you to believe  
10 it was harassment on the basis of race?

11 A As the sheriff and former sheriff -- as the  
12 sheriff at the time, he represented the view of the  
13 department.

14 Q What about being the sheriff and  
15 representing -- the former sheriff and the sheriff --  
16 sorry. Excuse me.

17 What about being the sheriff at the time and  
18 representing the views of the department indicates it's  
19 harassment on the basis of race or national origin?

20 A In conjunction with the statements made in the  
21 way in which they were made, it's a power dynamic, I  
22 guess.

23 Q What about it and what about the power dynamic  
24 indicates it's harassment on the basis of race or  
25 national origin?

1 BY MR. DiBONA:

2 Q Did the CEOP uphold a finding that Alex  
3 Villanueva had harassed or discriminated against  
4 Esther Lim?

5 MR. TOKORO: Objection; vague and ambiguous,  
6 misuse of the term upheld.

7 THE DEPONENT: I think you're referring to a  
8 different investigation.

9 BY MR. DiBONA:

10 Q I believe I -- I believe I am. I'm just saying  
11 were you a part of the CEOP's recommendation with  
12 respect to the investigation in to Esther Lim?

13 A In to her complaint against former sheriff,  
14 I was -- that was the same briefing, I believe.

15 Q Understood. And did you -- and did you also  
16 recommend that the finding of harassment or  
17 discrimination be upheld with respect to Esther Lim?

18 MR. TOKORO: Same objection; misuse of the term  
19 "upheld."

20 THE DEPONENT: Were you asking me about what  
21 the sheriff's department did or -- or what?

22 BY MR. DiBONA:

23 Q I'm asking what you -- what -- what the CEOP  
24 did.

25 A To my recollection, the panel followed the same



1 process in the case involving the complaint by Ms. Lim  
2 as it did the complaint involving Mr. Huntsman.

3 Q And do you, as you sit here today, I know I  
4 haven't shown a document yet, do you have a recollection  
5 of the basis for which there was a recommendation that  
6 the charge of harassment or discrimination be founded  
7 against Alex Villanueva with respect to Esther Lim?

8 A To my recollection there was -- there were  
9 statements by the sheriff about the number of  
10 assistants, of which Ms. Lim was one, being female. And  
11 some statement about one of the supervisors or her  
12 assistant related to her Hispanic heritage, I think.

13 MR. DiBONA: I'm going to send Exhibit 3  
14 through the chat. And I also will share the screen.

15 (Plaintiff's Exhibit 3 was retained by counsel)

16 BY MR. DiBONA:

17 Q Do you see a document on your screen?

18 A I do.

19 Q Exhibit 3 is COLA 002120 and it goes to 2199.

20 Just so we have a clear record, does this look  
21 like the IA report you reviewed with respect to Esther  
22 Lim's complaint against Sheriff Alex Villanueva?

23 A I don't see her name, but that's what reports  
24 look like. Yes. That would be it.

25 Q Excuse me. Apart from reviewing this report,

1 Q And so do you have any reason to believe woke  
2 20-somethings that work at the alter of wokeness has  
3 anything to do with an individual's race or national  
4 origin?

5 MR. TOKORO: Objection. Question is vague and  
6 ambiguous and does not take into account all of the  
7 allegations made in the complaint.

8 THE DEPONENT: Not specifically, no.

9 BY MR. DiBONA:

10 Q Do you have any reason to believe that woke  
11 20-somethings that prohibit the alter of wokeness has  
12 any reference to an individual's gender?

13 MR. TOKORO: Same objection; incomplete, vague  
14 and ambiguous.

15 THE DEPONENT: It doesn't appear to be directed  
16 at gender specifically.

17 BY MR. DiBONA:

18 Q It goes on. There's a sentence here:  
19 (Reading:) He said that all -- all are women. Sheriff  
20 Villanueva said that the supervisors promote diversity,  
21 but the justice deputies are all women and unqualified.

22 Did I read that correctly?

23 A That's what I see.

24 Q Do you see any reference in this to Sheriff  
25 Villanueva saying women are unqualified for the position

1 because they're women?

2 A Yes.

3 Q Where is that?

4 A It's the dualism of using the words "together"  
5 under the introductory word of "Diversity."

6 Q So just to be clear, you're saying referring to  
7 someone as a woman and unqualified implies that  
8 they're -- because they're women they're unqualified?

9 MR. TOKORO: Objection; misstates the  
10 testimony.

11 The prior question was about what Villanueva  
12 said.

13 THE DEPONENT: I said when he says here that  
14 supervisors promote diversity, the implication in his  
15 statement following is that hiring women did not promote  
16 diversity because they were unqualified or some such  
17 thing.

18 BY MR. DiBONA:

19 Q Right. Do you believe that -- did you form the  
20 opinion that Sheriff Villanueva was saying women are  
21 unqualified by virtue of being women?

22 MR. TOKORO: Objection; asked and answered two  
23 times now.

24 THE DEPONENT: The implication from the  
25 sentence is that unqualified individuals were hired

1 because they were women.

2 BY MR. DiBONA:

3 Q "During those sessions, he has referred to the  
4 age of justice deputies which is alive and can be easily  
5 be fact checked."

6 Did I read that correctly?

7 A That's what I see.

8 Q He also says:

9 "The justice deputies are all female, even  
10 though Supervisor Mitchell has two male justice  
11 deputies."

12 Did I read that correctly?

13 A That's what I'm reading.

14 Q So when there's a reference to all the justice  
15 deputies, that includes a group that at least has two  
16 men in it; right?

17 A That's what --

18 MR. TOKORO: Objection; vague and ambiguous as  
19 to whether you're referring to Sheriff Villanueva's  
20 statement or the facts generally.

21 THE DEPONENT: What was the question?

22 MR. DiBONA: Can you read the question back,  
23 Ms. Meyer, please.

24 (The record was read as requested)

25 THE DEPONENT: A reference by whom?

1 to women, not specifically.

2 Q Just to be clear, the Los Angeles County  
3 policies against harassment on the basis of gender do  
4 not prohibit talking to two women at the same time;  
5 correct?

6 A It depends on what they're saying.

7 Q Does the -- does the Los Angeles County policy  
8 against discrimination and harassment on the basis of  
9 sex have anything to do with a sheriff saying, "I can  
10 tell from your age you are one of those people that hate  
11 the police and want to defund us"?

12 A It could, depending on the totality of the  
13 circumstances.

14 Q In this totality of the circumstances, does it?

15 MR. TOKORO: Objection; vague and ambiguous as  
16 to what you mean by "this."

17 THE DEPONENT: It could, yes.

18 BY MR. DiBONA:

19 Q And in your opinion -- in your opinion, did you  
20 believe Sheriff Villanueva was engaged in harassment on  
21 the basis of sex or gender when he said to Ms. Coates,  
22 "I can tell from your age you are one of those people  
23 that hate the police and want to defund us"?

24 A In the totality of the circumstances, yes.

25 Q What were the totality of the circumstances

1 that you're referring to?

2 A It would be the other comments about women --  
3 deputies and women who aren't qualified.

4 Q Anything else?

5 A I would have to read the whole report to come  
6 up with more, but that seems like enough.

7 Can we go off for a second?

8 Q Is there a reason why? I don't mind taking  
9 another break, if you need to.

10 A No. I'm just wondering whether we were going  
11 to power through.

12 Q Oh, yeah. I'm sorry. Let's go off the record  
13 just for a second.

14 (Lunch recess was taken)

15 MR. DiBONA: Back on the record.

16 Q Ms. Komoroski, do you understand you're still  
17 under oath?

18 A I do.

19 Q Any reason you can't continue to give your best  
20 testimony?

21 A No.

22 Q One moment. I'm just going to put back  
23 something on the screen here.

24 Do you see the document on your screen?

25 A I do.

1 THE DEPONENT: It looks like this is a further  
2 indication of him in uniform discussing a motion drafted  
3 by the complaining party and referring to it in a  
4 disparaging way in that she didn't understand what she  
5 was doing.  
6 BY MR. DIBONA:

7 Q Just to be clear, you think that saying she  
8 didn't understand her job is somehow inappropriate?

9 A It's inappropriate in general.

10 Q Just to be clear, it's inappropriate in  
11 general; is that right?

12 A Yes.

13 Q How is it inappropriate in general?

14 A Sheriff Villanueva, in uniform, conducted a  
15 Facebook Live session and discussed a motion the  
16 complaining party drafted, said he did not approve of  
17 it, and that the drafter did not realize the  
18 implications of the motion.

19 Q Yes. I understand that's what it said. My  
20 question to you is you used the phrase "it's  
21 inappropriate in general."

22 I'm asking are you able to explain what you  
23 mean by when you say "inappropriate in general"?

24 A The department head using a social media stream  
25 to criticize the justice deputy after having or in the

1 context of having characterized all the justice deputies  
2 as women and unqualified is inappropriate.

3 Q See here where it says, "Ms. Lim" -- sorry.  
4 "Justice deputy told Ms. Lim that Sheriff  
5 Villanueva said all supervisors have 25-year-olds right  
6 out of college writing their motions. Ms. Lim found  
7 this to be an offensive and ageist comment. She  
8 believes it is ageist because it assume the justice  
9 deputies are right out of college, and it minimizes  
10 their education and intellect."

11 Did I read that correctly?

12 A That's what it says.

13 Q And, again, it may be obvious, but being  
14 under -- being 25 necessarily means you're under  
15 40; correct?

16 MR. TOKORO: Objection. It's misstating the  
17 statement and the intent of what Villanueva was saying.

18 THE DEPONENT: If you're under 25, you're not  
19 40. But if you are professional and characterized as  
20 young, female, and unqualified, it relates to a  
21 potential violation under the policy.

22 Time change next weekend.

23 BY MR. DiBONA:

24 Q Do you see here under "History of intimidation  
25 of women of color"? Do you see that?



1 Villanueva.

2 BY MR. DiBONA:

3 Q What comments are you referring to?

4 A I can say, for example, that the board of  
5 supervisors -- I forget the verb they use -- once it  
6 professes to diversity but hired all justice deputies  
7 who are women and unqualified, that they worshiped at  
8 the alter of wokeness; and that faced with criticism by  
9 Ms. Lim, he wrote a letter requesting that her -- the  
10 forum for her criticism be investigated, and that she be  
11 terminated. And the comments, disparaging comment  
12 towards Supervisor Solis in her language reflecting her  
13 gender.

14 A little froggy.

15 Q I'm sorry. Let me just go back up. Do you see  
16 here there's a reference to Veronica Pawlowski?

17 A I do.

18 Q And you understand that the text below that is  
19 the interview summary with respect to Ms. Pawlowski;  
20 correct?

21 A It does appear to be that.

22 Q Just a moment. I'm just seeing what I asked  
23 you about.

24 A Of course.

25 Q Do you see here where it says:

1 A Yes.

2 Q And how many times have you done that?

3 A It's hard to say. It comes up maybe once a  
4 month or so, maybe less, maybe every other month or so.

5 Q Have you recommended that another employee of  
6 the sheriff's department be placed on the "Do not hire"  
7 list apart from Sheriff Villanueva, again, without  
8 telling me a name who that individual may be.

9 A There's no list.

10 Q Sorry. Besides former Sheriff Alex Villanueva,  
11 have you recommended that another employee of the  
12 sheriff's department have a "Do not rehire" notation  
13 placed in their personnel file, without telling me a  
14 name.

15 A I believe so. A couple.

16 Q Just to be clear, you believe so for a couple,  
17 but are you sure -- are you sure -- sorry. Just to be  
18 clear, are you not sure of the number? Are you  
19 estimating the number?

20 A Yes.

21 Q In other words, just so I understand the  
22 testimony, "Yes," you remember doing a -- recommending a  
23 "Do not rehire" notation in a sheriff's department's  
24 employee's file besides Sheriff Alex Villanueva, you're  
25 not sure of the number of times; is that fair?

1 question, it means public, privately, just you don't

2 have any knowledge of that. Is that fair to say?

3 A I don't have any knowledge of that.

4 Q And were you aware one way or the other of

5 Sheriff Villanueva's enforcement of vaccine mandates?

6 A No.

7 Q Do you know one way or the other if Sheriff

8 Villanueva enforced the vaccine mandate with respect to

9 the sheriff's department?

10 A I don't know.

11 Q As you sit here today, do you believe any part

12 of your testimony needs to be changed at this time?

13 A I can't think of anything. Some names I may

14 get wrong.

15 MR. DiBONA: I don't have any further

16 questions.

17 Do you, Counsel?

18 MR. TOKORO: I do. I do.

19

20 EXAMINATION

21 BY MR. TOKORO:

22 Q Ms. Komoroski, you were just asked a number of

23 questions by Mr. DiBona about various measures --

24 Ms. Komoroski, Mr. DiBona just asked you

25 questions about various measures and Sheriff Villanueva

1 or Mr. Villanueva's opposition to them.

2 Do you recall that testimony?

3 A Yes.

4 Q Okay. So the first thing that he asked you  
5 about was ballot Measure A. I believe your testimony  
6 was you don't know Sheriff Villanueva's position on  
7 ballot Measure A; is that correct?

8 MR. DiBONA: Objection; leading, form.

9 THE DEPONENT: Yes.

10 BY MR. TOKORO:

11 Q Okay. And Sheriff Villanueva in this case has  
12 alleged that being given the "Do not rehire" was in  
13 retaliation for his position on ballot Measure A. So I  
14 want to ask you about ballot Measure A specifically.

15 When you were coming up with your  
16 recommendation or the CEOP was coming up with its  
17 recommendation for the "Do not rehire," did ballot  
18 Measure A have anything to do with that recommendation?

19 MR. DiBONA: Objection; form, leading.

20 THE DEPONENT: No.

21 (Pause in proceedings)

22 BY MR. TOKORO:

23 Q Did ballot Measure A have anything to do with  
24 the CEOP's recommendation that Sheriff Villanueva be  
25 given a "Do no rehire" notation?

1 A No.

2 MR. DiBONA: Objection --

3 THE DEPONENT: No.

4 BY MR. TOKORO:

5 Q Did Mr. Villanueva's opposition to ballot

6 Measure A have any role in the CEOP's recommendation to

7 give him a "Do not rehire" notation?

8 MR. DiBONA: Objection; form.

9 THE DEPONENT: I didn't know he was opposed,

10 but, no, it didn't.

11 BY MR. TOKORO:

12 Q Okay. Ballot Measure R., let's talk about that

13 now. Did ballot Measure R play any role in the CEOP's

14 decision to give Mr. Villanueva or recommend that

15 Mr. Villanueva be given a "Do not rehire" notation at

16 the top of his file?

17 MR. DiBONA: Objection; form.

18 THE DEPONENT: No.

19 BY MR. TOKORO:

20 Q Did Mr. Villanueva's opposition to ballot

21 Measure R play any role in the CEOP's recommendation for

22 a "Do not rehire" notation?

23 MR. DiBONA: Objection; form.

24 THE DEPONENT: No.

25 ///

1 BY MR. TOKORO:

2 Q I want to talk about ballot Measure J now. Did  
3 ballot Measure J play any role in the CEOP's  
4 recommendation to give Mr. Villanueva a "Do not rehire"  
5 notation?

6 A No.

7 Q Did Mr. Villanueva's opposition to ballot  
8 Measure J play any role in the CEOP's recommendation to  
9 place a "Do not rehire" on the top of his County file?

10 MR. DiBONA: Objection; form.

11 THE DEPONENT: No.

12 BY MR. TOKORO:

13 Q Did sheriff -- did Mr. Villanueva's public  
14 statement about any of those ballot measures play any  
15 role in the CEOP's recommendation for a "Do not rehire"?

16 MR. DiBONA: Objection; form.

17 THE DEPONENT: No.

18 BY MR. TOKORO:

19 Q Now I want to talk about Fulgent. Did  
20 Fulgent -- did the County's contract with Fulgent play  
21 any role in the CEOP's recommendation of a "Do not  
22 rehire"?

23 MR. DiBONA: Objection; form.

24 THE DEPONENT: No.

25 ///

1 BY MR. TOKORO:

2 Q Did Mr. Villanueva's opposition to the Fulgent  
3 contract play any role in the CEOP's recommendation of a  
4 "Do not rehire"?

5 MR. DiBONA: Objection; form.

6 THE DEPONENT: No.

7 BY MR. TOKORO:

8 Q Did Mr. Villanueva's public statements about  
9 Fulgent play any role in the CEOP's recommendation for a  
10 "Do not rehire"?

11 A No.

12 Q Did vaccine mandates play any role in the  
13 CEOP's recommendation that Mr. Villanueva be given a "Do  
14 not rehire" notation?

15 MR. DiBONA: Objection; form.

16 THE DEPONENT: No.

17 BY MR. TOKORO:

18 Q Did Mr. Villanueva's refusal to enforce vaccine  
19 mandates as to sworn sheriff deputies play any role in  
20 the CEOP's recommendation of a "Do not rehire"?

21 A No.

22 Q Did Mr. Villanueva's public statements about  
23 vaccine mandates relating to COVID play any role in the  
24 CEOP's recommendation that he be given a "Do not rehire"  
25 notation?

1 A No.

2 Q Now, you were asked several questions by  
3 Mr. DiBona about whether you reviewed the Facebook Live  
4 statements made by Mr. Villanueva or the KFI radio  
5 statements made by Mr. Villanueva; do you recall that?

6 A I do.

7 Q Okay. Just to be clear, those materials -- the  
8 Facebook Live videos, the KFI radio recordings, and  
9 other public statements made by Sheriff Villanueva --  
10 those were provided to you as part of the stacked case  
11 file; correct?

12 MR. DiBONA: Objection; form.

13 THE DEPONENT: Yes.

14 BY MR. TOKORO:

15 Q Had you had any questions about the accuracy of  
16 the report from Sanders Roberts, you could have gone to  
17 those recordings to check it; correct?

18 A Yes.

19 Q You mentioned an unidentified male from the  
20 sheriff's department sitting in on the pre briefing as  
21 well as the full briefing of the CEOP.

22 Do you recall that?

23 A Yes.

24 Q Was that unidentified male Commander  
25 Sergio Escobado?



1 A Yes. I always forget his name.

2 Q Now, you were asked a question by Mr. DiBona --  
3 well, a couple of questions. He asked you to confirm  
4 that Mr. Villanueva was not present during the CEOP  
5 briefing and that Mr. Huntsman was also not present  
6 during the CEOP briefing.

7 Do you recall that?

8 A Yes.

9 Q Is it standard practice for the CEOP to meet  
10 without the complainant in attendance?

11 A Yes. No witnesses should be in attendance  
12 either.

13 Q Does that also go for the subject of the  
14 investigation?

15 A Yes.

16 Q So neither the complainant nor the subjects  
17 attend these CEOP briefings; is that right?

18 A Correct.

19 Q And none of the witnesses attend either;  
20 correct?

21 A Correct.

22 Q Now, Mr. DiBona asked you some questions about  
23 the "Do not rehire" notation in this case and,  
24 specifically, the fact that Mr. Villanueva was no longer  
25 a County employee at the time the recommendation was

1 made. I want to ask you about the "Do not rehire,"  
2 specifically. You referred to it as a tool.

3 Is the "Do not rehire" notation a form of  
4 discipline?

5 MR. DiBONA: Objection --

6 THE DEPONENT: No.

7 Sorry. Please, go ahead.

8 MR. DiBONA: Objection to form.

9 THE DEPONENT: No.

10 BY MR. TOKORO:

11 Q And what exactly -- what is your understanding  
12 of what the "Do not rehire" notation means for purposes  
13 of someone re applying to the County for a job?

14 A At or near the top of the individual's  
15 personnel folder, from when they worked for the County  
16 in any capacity, it's an indication for the interviewing  
17 and selecting officials to see whether there was any  
18 prior discipline recommended for policy violations  
19 recommended for the individual.

20 Q Got it. So a former counter -- sorry. Let me  
21 start that over.

22 A former County employee who has a "Do not  
23 rehire" notation at the top of their file, can they be  
24 hired back by a County department?

25 MR. DiBONA: Objection; form.

1 THE DEPONENT: They can be or they can come

2 back as a contractor. It's up to the appraising

3 interview and selecting officials.

4 BY MR. TOKORO:

5 Q Got it. So the "Do not rehire" notation is not

6 a death sentence for working for the County.

7 Do you agree with me?

8 MR. DiBONA: Objection; form.

9 THE DEPONENT: I would.

10 BY MR. TOKORO:

11 Q Now, you were asked a number of questions about

12 Max Huntsman's complaint. And I just want to follow up

13 on a couple of things there.

14 You were asked a number of questions by

15 Mr. DiBona about Mr. Huntsman's birth name,

16 Max Gustaf Edler.

17 Do you remember that?

18 A I do.

19 Q Do you recall, also, though, that when

20 Mr. Huntsman was interviewed by Ms. Diaz Herrera, he

21 told her that he had been using the name Max Huntsman

22 from before he was even made the inspector general?

23 MR. DiBONA: Objection; form.

24 THE DEPONENT: I recall that he had been using

25 it for a long time, during most of his employment with

1 A That's what it says.

2 Q She made her complaint in March of 2022;  
3 correct?

4 A That's my understanding.

5 Q So at the time she would have been over the age  
6 of 40 years old; correct?

7 A That's the math.

8 Q So the policies that Mr. DiBona was showing to  
9 you applying to people 40 and over would apply to  
10 Ms. Lim; correct?

11 A I assume so, yes. Yes, it would.

12 Q Now, I want to separate the two investigations,  
13 and I'm almost finished here. But let's talk first  
14 about the investigation into complaint filed by Max  
15 Huntsman.

16 Was the board of supervisors, as far as you  
17 know, involved in the investigation into Mr. Huntsman's  
18 complaints?

19 A No.

20 Q Was the board involved, as far as you know, in  
21 this CEOP's pre briefing?

22 A No.

23 Q Was the board involved in the CEOP's briefing  
24 of the Huntsman complaint?

25 A No.

1 Q Was the board involved in any way in the CEOP's  
2 recommendation that the allegations made by Mr. Huntsman  
3 were founded against Mr. Villanueva?

4 A No.

5 Q Was Sheriff Luna involved at all in the CEOP's  
6 pre brief?

7 A No.

8 Q Was Sheriff Luna involved at all in the CEOP's  
9 briefing?

10 A No.

11 Q Was Sheriff Luna involved in any way in the  
12 CEOP's recommendation that the allegations made by  
13 Mr. Huntsman be determined founded against  
14 Mr. Villanueva?

15 A No.

16 Q Was Sheriff Luna at either pre briefing or the  
17 briefing?

18 A No.

19 MR. TOKORO: Alex, you can take that down, by  
20 the way. Thank you.

21 THE DEPONENT: I've never met him.

22 BY MR. TOKORO:

23 Q Now I want to talk about Ms. Lim. I want to  
24 ask you the same questions.

25 As far as you know, was the board involved in

1 the investigation to Ms. Lim's complaint?

2 A No.

3 Q Was the board involved in the CEOP's

4 pre briefing regarding Esther Lim's complaint?

5 A No.

6 Q Was the board involved in the briefing relating

7 to Esther Lim's complaint?

8 A No.

9 Q Was the board involved in any way in the CEOP's

10 recommendation that the allegations made by Ms. Lim be

11 determined founded against Mr. Villanueva?

12 A No.

13 Q Did the board, as far as you know, have any

14 involvement whatsoever in either of these

15 investigations?

16 A No.

17 Q Did Sheriff Luna have any involvement in either

18 of these investigations?

19 A No.

20 Q Now, one other thing that Mr. Villanueva has

21 alleged in this case is that the "Do not rehire"

22 notation was given to him in retaliation for announcing

23 that he was going to be running for the County Board of

24 Supervisors.

25 Did the CEOP's recommendation that he be given

1 the "Do not rehire" notation have anything to do with

2 Sheriff Villanueva -- sorry -- Mr. Villanueva running

3 for a County Board of Supervisor position?

4 A No.

5 MR. DiBONA: Objection to form.

6 BY MR. TOKORO:

7 Q At the time you made the recommendation, were

8 you even aware that Mr. Villanueva was running for that

9 position?

10 MR. DiBONA: Objection; form.

11 THE DEPONENT: No. Sorry. No.

12 BY MR. TOKORO:

13 Q And Mr. Villanueva has also alleged that the

14 reason this was given to him, the "Do not rehire"

15 notation is to hinder his prospects of being elected to

16 the County Board of Supervisors.

17 Did that have anything to do with your

18 recommendation that he be given the "Do not rehire"

19 notation?

20 MR. DiBONA: Objection; form.

21 THE DEPONENT: No.

22 BY MR. TOKORO:

23 Q Thank you, Ms. Komoroski.

24 MR. DiBONA: I'm sorry. If you're done, I just

25 have one or two follow-up questions related to his

1 (Whereupon, at 2:59 p.m., the deposition  
2 of CONSTANCE MARIE KOMOROSKI, ESQ. was concluded)

3 \* \* \*

4

5

6

7 I have read the foregoing deposition transcript and  
8 by signing hereafter, approve same.

9

10 Dated March 12, 2025.

11

12

13



14

CONSTANCE MARIE KOMOROSKI, ESQ.

15

16

17

18

19

20

21

22

23

24

25



1 DEPOSITION OFFICER'S CERTIFICATE

2

3 STATE OF CALIFORNIA )  
4 ) ss.  
COUNTY OF LOS ANGELES)

5

6 I, Cila Meyer, hereby certify: I am a duly  
7 qualified Certified Shorthand

8 Reporter, in the State of California, holder of  
9 Certificate Number CSR 4914 issued by the Court

10 Reporters Board of California and which is in  
11 full force and effect. (Bus. & Prof. 8016)

12 I am not financially interested in this action  
13 and am not a relative or employee of any attorney of the  
14 parties, or of any of the parties. (Civ. Proc.  
15 2025.320(a))

16 I am authorized to administer oaths or  
17 affirmations pursuant to California Code of Civil  
18 Procedure, Section 2093(b) and prior to being examined,  
19 the deponent was first placed under oath or affirmation  
20 by me. (Civ. Proc. 2025.320, 2025.540(a))

21 I am the deposition officer that  
22 stenographically recorded the testimony in the foregoing  
23 deposition and the foregoing transcript is a true record  
24 of the testimony given. (Civ. Proc. 2025.540(a))

25 I have not, and shall not, offer or provide any

1 services or products to any party's attorney or third  
2 party who is financing all or part of the action without  
3 first offering same to all parties or their attorneys  
4 attending the deposition and making same available at  
5 the same time to all parties or their attorneys. (Civ.  
6 Proc. 2025.320(b))

7 I shall not provide any service or product  
8 consisting of the deposition officer's notations or  
9 Comments regarding the demeanor of any witness,  
10 attorney, or party present at the deposition to any  
11 party or any party's attorney or third party who is  
12 financing all or part of the action, nor shall I collect  
13 any personal identifying information about the witness  
14 as a service or product to be provided to any party or  
15 third party who is financing all or part of the action.

16 (Civ. Proc. 2025.320(c))

17

18 Dated: March 10, 2025

19

20

21

\_\_\_\_\_

22

23

24

25

# EXHIBIT 5

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

ALEX VILLANUEVA,

No. 2:24-CV-04979

SVW (JCx)

Plaintiff,

vs.

COUNTY OF LOS ANGELES, COUNTY OF  
LOS ANGELES SHERIFF'S DEPARTMENT,  
LOS ANGELES COUNTY BOARD OF  
SUPERVISORS, COUNTY EQUITY OVERSIGHT  
PANEL, LOS ANGELES COUNTY OFFICE OF  
INSPECTOR GENERAL, CONSTANCE  
KOMOROSKI, MERCEDES CRUZ, ROBERT A.  
YANG, LAURA LECRIVAIN, SERGIO V.  
ESCOBEDO, RON KOPPERUD, ROBERT G.  
LUNA, MAX-GUSTAF HUNTSMAN, ESTHER  
LIM, and DOES 1 to 100, inclusive,

Defendants.

---

VIDEOTAPED DEPOSITION of ALEX VILLANUEVA  
LOS ANGELES, CALIFORNIA  
FRIDAY, FEBRUARY 28, 2025  
VOLUME 1

Reported by  
Daryl Baucum, RPR, CRR, RMR, CSR No. 10356

Job No. 7184228, PAGES 1 - 334

Page 1

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

ALEX VILLANUEVA,

No. 2:24-CV-04979

SVW (JCx)

Plaintiff,

vs.

COUNTY OF LOS ANGELES, COUNTY OF  
LOS ANGELES SHERIFF'S DEPARTMENT,  
LOS ANGELES COUNTY BOARD OF  
SUPERVISORS, COUNTY EQUITY OVERSIGHT  
PANEL, LOS ANGELES COUNTY OFFICE OF  
INSPECTOR GENERAL, CONSTANCE  
KOMOROSKI, MERCEDES CRUZ, ROBERT A.  
YANG, LAURA LECRIVAIN, SERGIO V.  
ESCOBEDO, RON KOPPERUD, ROBERT G.  
LUNA, MAX-GUSTAF HUNTSMAN, ESTHER  
LIM, and DOES 1 to 100, inclusive,

Defendants.

---

VIDEOTAPED DEPOSITION of ALEX VILLANUEVA,  
at Miller, Barondess, 2121 Avenue of the Stars,  
Suite 2600, Los Angeles, California, beginning  
at 10:05 a.m., and ending at 5:16 p.m., on  
Friday, February 28, 2025, before Daryl Baucum,  
RPR, CRR, RMR, CSR No. 10356.

Page 2

1 APPEARANCES OF COUNSEL:

2  
3 FOR THE PLAINTIFF:

4  
5 SHEGERIAN & ASSOCIATES

6 BY: ALEX DI BONA, ATTORNEY AT LAW

7 11520 San Vicente Boulevard

8 Los Angeles, California 90049

9 310.860.0770

10 ADiBona@ShegerianLaw.com

11  
12  
13 FOR THE DEFENDANTS:

14  
15 MILLER, BARONDESS

16 BY: JASON H. TOKORO, ATTORNEY AT LAW

17 STEVEN G. WILLIAMSON, ATTORNEY AT LAW

18 2121 Avenue of the Stars

19 Suite 2600

20 Los Angeles, California 90067

21 310.552.4400

22 JTokoro@MillerBarondess.com

23 SWilliamson@MillerBarondess.com

24  
25  
Page 3

1 APPEARANCES OF COUNSEL (CONTINUED):

2  
3  
4 ALSO PRESENT:

5 JON MANUEL, Videographer  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Page 4

1 A This is for July 12 of 2022.

12:41:57

2 Q Yep, and I have highlighted all of the  
3 page and line numbers for you to make it easy.

4 A No, I spoke at this thing. I don't think  
5 it aligns but I do know I spoke against in at the

12:44:49

6 Board, and I think it was via Zoom but --

7 Q I'm just asking -- I'm just asking when  
8 you look at the page and line numbers which you  
9 identified which had been highlighted in Exhibit 12,  
10 that is not you speaking, correct?

12:45:03

11 A No, these are the supervisors speaking  
12 against me.

13 Q Great.

14 Now, you understand -- or do you recall  
15 that Measure A was not brought before the Board  
12:45:16

16 until July of 2022?

17 MR. DI BONA: Objection; form.

18 THE WITNESS: That is more or less the  
19 time frame, yes.

20 BY MR. TOKORO:

12:45:28

21 Q So that was four months after Max Huntsman  
22 and Esther Lim had filed their complaints, correct?

23 MR. DI BONA: Objection; form.

24 THE WITNESS: Partially true.

25

Page 132



1 BY MR. TOKORO:

12:45:39

2 Q In fact, it was four months after you had  
3 received notification -- or at least a month after  
4 you had received notification of the two pending  
5 investigations, correct?

12:45:47

6 A Wait. I lost you there.

7 Q So Measure A -- Ballot Measure A comes up  
8 to the Board for the first time in July of 2022.

9 That is your recollection, as well,  
10 correct?

12:45:58

11 A No, the Measure A -- the start of it was  
12 the vote from the previous year, let's explore ways  
13 to get rid of the Sheriff, and the Measure A was the  
14 outcome of that.

15 Q But Measure A, itself -- I'm just talking

12:46:13

16 about Ballot Measure A, which you reference in your  
17 First Amended Complaint, came up in front of the  
18 Board in July of 2022, correct?

19 A In its final form, yes.

20 Q And that was several months after Esther

12:46:27

21 Lim and Max Huntsman had filed their complaints,  
22 correct?

23 MR. DI BONA: Objection; form.

24 THE WITNESS: Yes.

25

1 A Yes.

14:26:49

2 Q Now, the policy of equality is contained  
3 within the Department's Manual of Policies and  
4 Procedures, correct?

5 A Yes.

14:26:53

6 Q And as Sheriff of L.A. County, you are  
7 still subject to those policies and procedures,  
8 correct?

9 A In theory, yes.

10 Q And you were subject to the

14:27:00

11 anti-harassment, anti-discrimination policies,  
12 correct?

13 A Yes.

14 Q And, in fact, you were notified of the  
15 investigation being done into Ms. Lim's complaints,

14:27:11

16 correct?

17 A Yes.

18 Q Let's take a look at that.

19 (Deposition Exhibit 17 was marked  
20 for identification by the court

14:27:28

21 reporter and is attached hereto.)

22 BY MR. TOKORO:

23 Q Mr. Villaneuva, you have been handed  
24 Deposition Exhibit 17.

25 Do you recognize this document?

14:28:02

Page 188

1 A Yes.

14:28:03

2 Q So this is a notification that you were  
3 given in June of 2022, correct?

4 A Yes.

5 Q And it was -- you see there at the top,

14:28:11

6 it's from Ed Alvarez to Ron Kopperud, correct?

7 A Yes.

8 Q And you are identified as the subject  
9 employee, correct?

10 A Yes.

14:28:23

11 Q And the Department's knowledge date is  
12 March 17 of 2022.

13 Do you see that?

14 A Yes.

15 Q That would be the date that the complaint

14:28:29

16 came in, correct?

17 A Well, it came into the Department.

18 Q Correct. Came into the Department, yes.

19 And then below there, it lists a number of

20 POEs that allegedly were violated by your conduct,

14:28:40

21 correct?

22 A Yeah, allegedly.

23 Q So you got the POE on discrimination,

24 correct?

25 A Yes.

14:28:52

Page 189

1 Q The POE on sexual harassment, correct?

14:28:52

2 A Yes.

3 Q The POE on discriminatory harassment other  
4 than sexual, correct?

5 A Yes.

14:29:03

6 Q Third-person harassment, correct?

7 A Yes.

8 Q Inappropriate conduct towards others,  
9 correct?

10 A Yes.

14:29:10

11 Q And retaliation, right?

12 A Yes.

13 Q And it says,

14 "It is alleged that you acted in an  
15 inappropriate POE related matter

14:29:15

16 and made inappropriate POE related  
17 remarks while in the workplace."

18 Do you see that?

19 A Yes.

20 Q And that's your signature there at the

14:29:23

21 bottom, right?

22 A Yes.

23 Q June 29 of 2022?

24 A Yes.

25 Q And that's your employee number?

14:29:27

Page 190

1 A Yep.

14:29:29

2 Q And who is the witness?

3 A John Satterfield.

4 Q And you were familiar with these policies  
5 of the Department, correct?

14:30:02

6 A Yes.

7 Q And you were knowledgeable about what they  
8 prohibited sworn deputies from doing, correct?

9 A Correct. All employees.

10 Q Now, at the time in June of 2022, John

14:30:44

11 Satterfield was your Chief of Staff, correct?

12 A I believe so.

13 Q And are you aware that Christine  
14 Diaz-Herrera, the investigator from Sanders,  
15 Roberts, reached out to you through Mr. Satterfield

14:30:57

16 to set up an interview in connection with this  
17 investigation -- investigation?

18 A When?

19 Q Around this time, around in -- in  
20 June/July of 2022.

14:31:13

21 A Somebody spoke to me. I don't remember  
22 when or who.

23 Q What do you recall about that  
24 conversation?

25 A I think they asked me about the -- about

14:31:21

Page 191

1 least by investigation number what that related to,

14:43:25

2 correct?

3 MR. DI BONA: Objection; form.

4 THE WITNESS: That meant absolutely

5 nothing to me because I had no idea what the numbers

14:43:32

6 were for.

7 BY MR. TOKORO:

8 Q And I appreciate that that is your

9 opinion. I am asking you, you have had --

10 A That is a fact.

14:43:39

11 Q You had received the two letters and they

12 had the investigation numbers on them, correct?

13 A If you show me the letters with the IAB

14 numbers, yeah, I'll believe it.

15 Q We will get to that.

14:43:49

16 And, in fact, you refused to participate

17 in the interviews, right, unless you were given the

18 questions in advance, correct?

19 A I wanted to provide a written response.

20 Q Right.

14:44:04

21 You wanted to be given the questions and

22 you wanted to provide a written response rather than

23 be interviewed like this, correct?

24 A Correct.

25 Q And, again, that is not standard

14:44:14

Page 205

1 process -- procedure for IAB interviews, correct?

14:44:16

2 A There is no standard process for what they  
3 were doing. You know that.

4 Q And again, sitting here today, you're not  
5 aware of any IAB investigation where the witness was

14:44:25

6 given the questions and allowed to provide written  
7 responses, correct?

8 A Again, tell me all the examples of the  
9 investigation -- interviews of people who are not  
10 members of the Department.

14:44:43

11 Q You are missing the point.

12 What I am asking is, in any IAB interview  
13 that you have knowledge of, have you ever seen a  
14 witness, whether they're part of the Department or  
15 not, being given questions in advance and being

14:44:55

16 allowed to just provide written response?

17 MR. DI BONA: Objection; form.

18 THE WITNESS: When it's someone who is not  
19 a member of the Department and someone who lives in  
20 another state, some of them are done by

14:45:06

21 correspondence because you have no other choice.

22 BY MR. TOKORO:

23 Q So you are sitting here today telling me  
24 that you are aware of specific examples where IAB  
25 simply exchanged letters in order to get a witness's

14:45:15

Page 206

1 testimony?

14:45:19

2 A I am not aware of a specific example. I  
3 am being very commonsense. How else would you do  
4 it?

5 Q You are --

14:45:27

6 MR. DI BONA: Guys, guys, hold on.

7 MR. TOKORO: Alex, stop. Alex, stop.

8 MR. DI BONA: Let him finish his answer.

9 MR. TOKORO: Alex stop.

10 MR. DI BONA: Jason, let him finish his

14:45:35

11 answer.

12 MR. TOKORO: Stop, stop.

13 MR. DI BONA: And do not talk over me.

14 MR. TOKORO: Stop. You are not going to  
15 interview -- interrupt this interview.

14:45:40

16 MR. DI BONA: His answer was not finished.

17 MR. TOKORO: No, he was not -- he was  
18 finished.

19 MR. DI BONA: He was not finished.

20 MR. TOKORO: You need to calm down, Alex.

14:45:46

21 You need to calm down.

22 Those kinds of outbursts are not going  
23 to -- I'm not going to tolerate that. You want to  
24 scream and yell and bang the table, we're not going  
25 to deal with that. All right.

14:45:57

Page 207



1 BY MR. TOKORO:

14:45:58

2 Q So I'm asking you a very specific -- I'm  
3 not asking you to guess or assume or speculate.

4 I am asking you are you aware of any  
5 instance where an IAB interview was conducted via

14:46:07

6 letters.

7 MR. DI BONA: Objection to form.

8 THE WITNESS: I can only guess. I can  
9 only speculate if it was out of state or the person  
10 had retired, you are at the mercy of the person you

14:46:20

11 want the information from. That is commonsense.

12 BY MR. TOKORO:

13 Q Understood.

14 But sitting here today, you are not aware  
15 of a specific instance where that, in fact,

14:46:29

16 happened, correct?

17 A I am not an IAB investigator that knows  
18 all the body of investigation they have done.

19 Q That's all I am asking for you to do is  
20 confirm that. Okay. Let's see.

14:46:39

21 MR. DI BONA: Counsel, I am sorry. I  
22 didn't mean to raise my voice about that. I was  
23 just trying to assert an objection but I didn't mean  
24 to raise my voice. I do apologize for raising my  
25 voice.

14:47:05

Page 208

1 in it.

14:49:40

2 Q You are also aware that in March of 2022,  
3 Mr. Huntsman made a complaint against you, correct?

4 A Yes.

5 Q And what is your understanding of what

14:49:58

6 that complaint was?

7 A He was complaining about me using his  
8 legal name.

9 Q Now, you were notified of that  
10 investigation, as well, correct?

14:50:13

11 A Yes.

12 (Deposition Exhibit 19 was marked  
13 for identification by the court  
14 reporter and is attached hereto.)

15 BY MR. TOKORO:

14:50:14

16 Q Mr. Villaneuva, you have been handed what  
17 has been marked as Deposition Exhibit 19.

18 A Yes.

19 Q And do you see it is a notification of --  
20 dated June 27 of 2022?

14:51:14

21 A Yes.

22 Q And you see it's for investigation number  
23 2558097?

24 A Yes.

25 Q And this was sent to you while you were

14:51:27

Page 211

1 still Sheriff of L.A. County, correct?

14:51:29

2 A Yes.

3 Q And I see you reaching over to the other

4 notification that you received, Deposition

5 Exhibit 17.

14:51:37

6 Deposition Exhibit 17 is for investigation

7 number 2558101, correct?

8 A Yes.

9 Q Two separate investigations, correct?

10 A Yes.

14:51:46

11 Q And this investigation -- this

12 notification, again, identifies you as the subject,

13 correct?

14 A Yes.

15 Q And it identifies the Department knowledge

14:51:52

16 date as March 16 of 2022, correct?

17 A Yes.

18 Q And it identifies four potential MVP

19 violations, correct?

20 A Yes.

14:52:04

21 Q Discrimination, discriminatory harassment

22 other than sexual, third-party harassment, and

23 retaliation, correct?

24 A Correct.

25 Q And it says that you are alleged -- it is

14:52:12

Page 212

1           alleged you acted in an inappropriate POE-related

14:52:14

2           manner and in the workplace.

3                     Do you see that?

4           A     Yes.

5           Q     And that's your signature there at the

14:52:21

6           bottom, correct?

7           A     Correct.

8           Q     And that's Mr. Satterfield's signature to  
9           the right, correct?

10          A     Yes.

14:52:29

11          Q     And so you were aware that at least via  
12          this notification that on March 16, a complaint had  
13          been received against you by the Department,  
14          correct?

15          A     Correct.

14:52:43

16          Q     In fact, you were aware that the complaint  
17          that had been received by the Department was a  
18          complaint filed by Mr. Huntsman, correct?

19          A     Yes.

20          Q     And you were aware of what the substance

14:52:53

21          of the complaint was, correct?

22          A     I believe so, yes.

23          Q     In fact, you gave an interview with the  
24          "L.A. Times" on April 1 of 2023 -- sorry -- 2022, in  
25          which you talked about the fact that you were aware

14:53:07

Page 213

1 of the complaint he had filed against you, correct?

14:53:09

2 A If you say so.

3 Q My apologies for the delay. Too many  
4 documents here.

5 (Deposition Exhibit 20 was marked

14:54:14

6 for identification by the court  
7 reporter and is attached hereto.)

8 BY MR. TOKORO:

9 Q Mr. Villaneuva, you have been handed a  
10 document marked as Exhibit 20.

14:55:20

11 It's an "L.A. Times" article titled  
12 "Editorial: The Villanueva saga gets odder and more  
13 destructive."

14 Do you see that?

15 A Yes.

14:55:30

16 Q Do you recall this article being published  
17 by the "L.A. Times"?

18 A Oh, yeah.

19 Q In fact, I think as part of your  
20 interview, you told the "L.A. Times" that you pay

14:55:37

21 attention to the things that they are printing about  
22 you, correct?

23 A Yes.

24 Q And this was in connection with an  
25 interview you were doing with the "L.A. Times" about

14:55:44

Page 214

1 who they were going to support in the November 2022

14:55:47

2 election, correct?

3 A Yes.

4 Q And during that interview, you stated

5 that -- if you go to the top of the third page, that

14:55:58

6 Max had filed a complaint that you thought was kind

7 of humorous.

8 Do you see that?

9 A Which page, third?

10 Q Third page, 3 of 5.

14:56:10

11 A Uh-huh.

12 Q Do you see there at the top?

13 A Yes.

14 Q So you were aware at least April 1 of 2022

15 that Mr. Huntsman had filed a complaint against you

14:56:18

16 for the statements you were making about him,

17 correct?

18 A Yes.

19 Q And who did you find that out from?

20 A I don't recall.

14:56:28

21 Q Was it John Satterfield?

22 A I couldn't remember.

23 Q Because Mr. Satterfield, at least

24 according to the Department's records, admonished

25 you on March 23 of 2022.

14:56:38

Page 215

1 Do you recall that?

14:56:42

2 A I don't remember, specifically.

3 Q In fact, according to Department records  
4 created during the time you were still Sheriff,  
5 Mr. Satterfield admonished you regarding both of the

14:56:50

6 complaints, both Ms. Lim as well as Mr. Huntsman.

7 Do you recall that?

8 A I think at some point he advised me that  
9 they were in existence.

10 Q So Mr. Satterfield told you about what the

14:57:02

11 investigations related to, correct?

12 A Yes.

13 Q So you were aware of the Esther Lim  
14 complaint, correct?

15 A Yes --

14:57:11

16 Q And you were --

17 A -- at some point, I became aware.

18 Q Sorry.

19 And you were aware of the Huntsman

20 complaint, correct?

14:57:15

21 A Yes.

22 Q And the general substance of them,  
23 correct?

24 A Yes.

25 Q And in that same April 1, 2022, interview,

14:57:20

Page 216

1 just a couple of weeks after Mr. Huntsman made this

14:57:22

2 complaint, you refer to him as a Holocaust denier,  
3 right?

4 A Yes.

5 Q That was the first time you had said that

14:57:31

6 publicly about Mr. Huntsman, correct?

7 A Yes.

8 Q You said,

9 "You do realize that Max Huntsman,  
10 one, he is Holocaust denier."

14:57:39

11 Right?

12 A Yes.

13 Q (Reading):

14 "I don't know if you're aware of  
15 that. I have it from two separate

14:57:43

16 sources."

17 Do you see that?

18 A Yes.

19 Q It's on the page 2 of 5.

20 And you go further. You say,

14:57:50

21 "He filed a complaint against me  
22 because I refer to him as  
23 Max-Gustaf Huntsman, his actual  
24 legal name that is on his State Bar  
25 card."

14:58:02

Page 217



1 Do you see that?

14:58:02

2 A Yes.

3 Q So you knew exactly what the complaint was  
4 that was being made against you, correct?

5 A Yes.

14:58:06

6 Q The substance of it, correct?

7 A Yes.

8 Q And you went on to say,  
9 "We have it from two credible  
10 sources . . . and I am not going to

14:58:12

11 divulge them at this time.

12 But . . . you give a lot of  
13 credibility that he has a title,  
14 inspector general, and oh, my God,  
15 it sounds like so important and

14:58:22

16 credible."

17 Do you see that?

18 A Yes.

19 Q You didn't provide the information to the  
20 "L.A. Times" about your credible sources, correct?

14:58:27

21 A No.

22 Q In fact, you told them that they needed to  
23 do their own homework, right?

24 A Yes.

25 Q So two weeks after Mr. Huntsman had filed 14:58:36

Page 218

1 his complaint and sometime after -- you learned

14:58:37

2 about it sometime between then and April 1, correct?

3 A At some point, yes.

4 Q And then for the first time you refer to

5 him as a Holocaust denier, correct?

14:58:46

6 A Yes.

7 Q And do you remember when Mr. Satterfield

8 admonished you in that March 23, 2022, time period?

9 A No.

10 Q So you don't remember what he said to you.

14:59:38

11 A No.

12 Q Now, I want to go over some of the things

13 that Mr. Huntsman had identified that you had said

14 about him.

15 So one of the things he identified was you

14:59:55

16 gave an interview with KFI on March 6 of 2022.

17 Do you recall that interview?

18 A Not off the top of my head.

19 Q Do you recall in that interview that you

20 acknowledged you were aware that Max Huntsman had,

15:00:09

21 in fact, changed his name to just be Max Huntsman.

22 A I don't recall.

23 Q So you don't recall saying,

24 "Our Inspector General, the one and

25 only Max-Gustaf Huntsman, yes, he

15:00:20

Page 219

1 BY MR. TOKORO:

15:44:31

2 Q Now, do you have anything in writing with  
3 Mr. Alvarez regarding this conversation that you had  
4 with him?

5 A No. Phone calls don't generate writing.

15:44:37

6 Q Now, even after you found out about the  
7 investigations and being put on -- being given the  
8 do-not-rehire notation, you continued to make public  
9 statements about both Ms. Lim and Mr. Huntsman,  
10 correct?

15:45:44

11 MR. DI BONA: Objection; form.

12 THE WITNESS: I believe at some point,  
13 yes.

14 BY MR. TOKORO:

15 Q Yeah.

15:45:48

16 You continued to go on social media --  
17 your own personal at this time, Facebook Live -- and  
18 continued to make public statements about  
19 Mr. Huntsman, correct?

20 A No doubt.

15:45:57

21 Q You continued to make statements about  
22 Ms. Lim, correct?

23 A Not as much as Mr. Huntsman.

24 Q Well, you recently commented on the fact  
25 that Ms. Lim is now working for the Department

15:46:06

Page 250

1 again, correct -- not the Department -- for the

15:46:09

2 Board again, right?

3 A Yes. I believe she got rehired after  
4 getting fired.

5 Q Yeah.

15:46:16

6 You commented on about her during a  
7 September 25, 2024, Facebook Live video that you  
8 did, right?

9 A At some point, I did.

10 Q Right.

15:46:26

11 And you said,  
12 "Esther Lim, the, I guess,  
13 disgruntled former employee or  
14 Deputy of Supervisor Solis, she  
15 left that office and she's found a

15:46:34

16 soft landing with George Gascon  
17 while working directly under  
18 Tiffany Blackwell."  
19 That was you, right?

20 A I am pretty sure.

15:46:44

21 Q And,  
22 "This is very interesting because  
23 she -- her position as being  
24 anti-law enforcement is well known,  
25 extremely well-documented."

15:46:51

Page 251

1 Do you see that?

15:46:52

2 A Yes.

3 Q So even now, months after you filed this  
4 lawsuit and months after you learned of the  
5 do-not-rehire notation, you continue to make public

15:46:58

6 statements about Ms. Lim, correct?

7 A I'm going to say yes, but with an "and."

8 Q So you, in fact, even went further about  
9 Ms. Lim during this Facebook Live that you did and  
10 said,

15:47:24

11 "She is not an attorney and  
12 typically every job that goes to  
13 the D.A., particularly along those  
14 lines, they're all attorneys and  
15 she is not one. So how does she

15:47:32

16 land a special job that no one else  
17 had the right to apply for?"

18 Do you see that?

19 A Yes.

20 Q That was you, right?

15:47:40

21 A Pretty sure.

22 Q Now, December 4 of 2024, just a few months  
23 ago, another Facebook Live with you, right, where  
24 you said,

25 "Esther Lim, who was kicked out of

15:47:52

Page 252

1 the Hilda Solis's office sought

15:47:54

2 refuge with Gascon and she got

3 fired by Hoffman and that is good."

4 That was you, right?

5 A Yes.

15:47:59

6 Q So even with this lawsuit sitting out

7 there, you are continuing to go after Ms. Lim and

8 make public comment about her.

9 A I go after corrupt public officials.

10 Q Got it.

15:48:11

11 So this -- you're saying through these

12 Facebook Lives that she is corrupt, correct?

13 A Well, she had demonstrated that, yes.

14 Q Now, this one jumped out at me and this is

15 from May of 2023. It's a Facebook Live video that

15:48:25

16 you did that we pulled down ourselves.

17 And you say,

18 "If you have a station tattoo, even

19 one from one of the stations that

20 allegedly has, you know, all of

15:48:39

21 this violence and all of this

22 stuff, it doesn't matter as long as

23 are you in -- in the in-crowd.

24 Those are okay."

25 Do you remember saying that?

15:48:49

Page 253

1 A Oh, yes.

15:48:51

2 Q And you go on,  
3 "It's all the other unwashed  
4 heathens, and by the way, the  
5 overwhelming majority of these are

15:48:59

6 Latino deputies that are going to  
7 be impacted by this."  
8 Do you see that?

9 A Yes.

10 Q Do you recall saying that?

15:49:06

11 A Yes.

12 Q Do you recall what you said next?

13 A No, but I am pretty sure you are going to  
14 tell me.

15 Q I am.

15:49:12

16 "So is this some sort of ethnic  
17 cleansing that Max Huntsman is  
18 engaged in. His family has a long  
19 history of persecution and he knows  
20 what I am talking about."

15:49:22

21 That was you, right?

22 A Yes.

23 Q You said that about Max, right?

24 A Yes.

25 Q This is along the same lines that you were 15:49:27

Page 254

1 saying about him that he complained to you about,

15:49:29

2 right?

3 A Yes.

4 Q Let's talk about the damages you have

5 alleged in this case.

15:50:09

6 Now, where you have -- you are seeking two

7 forms of damages in this case, correct?

8 MR. DI BONA: Objection; calls for

9 attorney-client privilege and work product.

10 On that basis, I instruct you not to

15:50:22

11 answer that question.

12 MR. TOKORO: There is no privilege

13 objection when you put it in your discovery

14 responses.

15 BY MR. TOKORO:

15:50:29

16 Q So in your -- in your initial disclosures

17 in this case, you stated that you are seeking

18 economic damages well -- believed to be well more

19 than \$1 million, correct?

20 MR. DI BONA: Objection; form.

15:50:39

21 You may answer that.

22 THE WITNESS: Yes.

23 BY MR. TOKORO:

24 Q And you also say that you are seeking

25 noneconomic damages believed to be at least

15:50:44

Page 255



1           \$25 million, correct?

15:50:47

2                   MR. DI BONA: Objection; form.

3                   You may answer that question.

4                   THE WITNESS: Yes.

5           BY MR. TOKORO:

15:50:52

6           Q     That is for emotional distress that you  
7           are claiming, correct?

8           A     Yes.

9           Q     So let's talk about those economic damages  
10          first.

15:50:58

11                   You say that you're seeking at least  
12          \$1 million.

13                   What is the exact amount that you are  
14          seeking?

15                   MR. DI BONA: Objection; calls for expert

15:51:06

16                   testimony, attorney-client privilege and work  
17          product.

18                   On that basis, I instruct you not to  
19          answer that question.

20                   MR. TOKORO: Add that.

15:51:17

21          BY MR. TOKORO:

22           Q     So now, I know you produced a document --  
23           you recently applied to work at the L.A. Metro,  
24           correct?

25           A     Yes.

15:51:28

Page 256

1	Q L.A. Metro is a County entity, correct?	
	15:51:29	
2	A No, it's a separate entity.	
3	Q L.A. Metro, you are saying is not a County	
4	department?	
5	A It's its own standalone department. It's	
	15:51:39	
6	not part of County government.	
7	Q It's not funded by the County?	
8	A It's a combination of county, city, and	
9	what do they call those -- joint powers?	
10	Q Right.	
	15:51:52	
11	But it's like the Sheriff's Department and	
12	it falls under the umbrella of the County, correct?	
13	A Actually, the Board of Directors of the	
14	MTA includes the Mayor of L.A.; four Councilmen, I	
15	think, from L.A.; the five Supervisors; two other	
	15:52:02	
16	City Councilmen from other cities like Whittier, for	
17	example.	
18	Q And you have been asked to come in for an	
19	interview, right?	
20	A Yes.	
	15:52:13	
21	Q So this allegation that you have made that	
22	the do-not-rehire prevents you from seeking	
23	employment with other government entities, the Metro	
24	is willing to interview you, correct?	
25	MR. DI BONA: Objection; form.	15:52:25
		Page 257

1 You may answer.

15:52:26

2 THE WITNESS: I did a preliminary  
3 screening with the headhunting firm and am waiting  
4 for a call back.

5 BY MR. TOKORO:

15:52:35

6 Q Great. Good luck.

7 And the other thing -- and just to be very  
8 clear, other than applying to L.A. Metro, have you  
9 applied to any other jobs?

10 A No.

15:52:48

11 Q You haven't applied to any jobs with the  
12 County, correct?

13 A Not yet.

14 Q And you haven't applied for any other jobs  
15 with other law enforcement agencies, correct?

15:52:56

16 A That's the first.

17 Q Now, in your -- well, actually, let's go  
18 back to Trial Exhibit -- sorry, Depo Exhibit 13.

19 This is your discovery responses.

20 A 13. Got it.

15:53:12

21 Q So in this discovery response -- well, the  
22 discovery request was to describe in detail all  
23 losses of earnings and other employment benefits you  
24 claim to have suffered as a result of Defendants'  
25 alleged conduct as described in your First Amended

15:53:41

Page 258

1 STATE OF \_\_\_\_\_ )  
 ) Ss.  
2 COUNTY OF \_\_\_\_\_ )  
3

4 I, DARYL BAUCUM, a Certified Shorthand  
5 Reporter of the State of California, do hereby  
6 certify;

7 That the foregoing proceedings were taken  
8 before me at the time and place herein set forth,  
9 at which time the witness named in the foregoing  
10 proceeding was placed under oath; that a record  
11 of the proceedings was made by me using machine  
12 shorthand which was thereafter transcribed under my  
13 direction; and that the foregoing pages contain a  
14 full, true and accurate record of all proceedings  
15 and testimony to the best of my skill and ability.

16 I further certify that I am neither  
17 financially interested in the outcome nor a relative  
18 or employee of any attorney or any party to this  
19 action.

20 IN WITNESS WHEREOF, I have subscribed my  
21 name this 5th day of March 2025.  
22

23   
24

25 DARYL BAUCUM, CSR No. 10356

1 JASON H. TOKORO, ESQ.

2 JTokoro@MillerBarondess.com

3 March 5, 2025

4 RE: Villanueva, Alex v. County Of Los Angeles

5 2/28/2025, Alex Villanueva , Volume 1, (#7184228).

6 The above-referenced transcript has been

7 completed by Veritext Legal Solutions and

8 review of the transcript is being handled as follows:

9 \_\_\_ Per CA State Code (CCP 2025.520 (a)-(e)) - Contact Veritext  
10 to schedule a time to review the original transcript at  
11 a Veritext office.

12 \_\_\_ Per CA State Code (CCP 2025.520 (a)-(e)) - Locked .PDF  
13 Transcript - The witness should review the transcript and  
14 make any necessary corrections on the errata pages included  
15 below, notating the page and line number of the corrections.  
16 The witness should then sign and date the errata and penalty  
17 of perjury pages and return the completed pages to all  
18 appearing counsel within the period of time determined at  
19 the deposition or provided by the Code of Civil Procedure.  
20 Contact Veritext when the sealed original is required.

21 \_\_\_ Waiving the CA Code of Civil Procedure per Stipulation of  
22 Counsel - Original transcript to be released for signature  
23 as determined at the deposition.

24 \_\_\_ Signature Waived - Reading & Signature was waived at the  
25 time of the deposition.

Page 335

1     \_\_\_ Federal R&S Requested (FRCP 30(e)(1)(B)) - Locked .PDF  
2     Transcript - The witness should review the transcript and  
3     make any necessary corrections on the errata pages included  
4     below, notating the page and line number of the corrections.  
5     The witness should then sign and date the errata and penalty  
6     of perjury pages and return the completed pages to all  
7     appearing counsel within the period of time determined at  
8     the deposition or provided by the Federal Rules.

9     \_X\_ Federal R&S Not Requested - Reading & Signature was not  
10    requested before the completion of the deposition.  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

# EXHIBIT 6

CERTIFIED COPY



1605 W. Olympic Blvd., Suite 800 Los Angeles, CA 90015

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ALEX VILLANUEVA vs COUNTY OF LOS ANGELES

VERONICA PAWLOWSKI

March 04, 2025

Lynn Ann Waters, RMR, CRR, CSR No. 14432, Job No. 6477



1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA  
3 WESTERN DIVISION  
4

5 ALEX VILLANUEVA,

6  
7 Plaintiff,

8 -vs- CASE NO. 2:24-cv  
-04979 SVW (JCx)

9 COUNTY OF LOS ANGELES, et al.,  
10 Defendants.

11 Deposition of  
12 VERONICA PAWLOWSKI

13 TUESDAY, MARCH 4, 2025  
10:00 a.m.

14 Taken via Zoom videoconference  
15

16 REPORTER: Lynn Ann Waters, RMR, CRR, CSR No. 14432  
17

18

19

20

21

22

23

24

25

PAWLOWSKI, VERONICA

Page 2

1 APPEARANCES:

2

ALEX DiBONA, ESQ.  
SHEGERIAN & ASSOCIATES, INC.  
11520 San Vicente Blvd.  
Los Angeles, CA 90049  
(310) 860-0070,  
adibona@shegerianlaw.com

6

On behalf of the Plaintiff;

7

8

JASON H. TOKORO, ESQ.  
MILLER, BARONDESS, LLP  
2121 Avenue of the Stars  
Suite 2600  
Los Angeles, CA 90067  
(310) 552-5226,  
jtokoro@millerbarondess.com

10

11

12

On behalf of the Defendant.

13

14 ALSO PRESENT:

15

Steven Williamson  
Alex Villanueva

16

17

18

19

20

21

22

23

24

25

1                   Were there any other members of the  
2 board of supervisors you believe he was  
3 disparaging and inappropriate towards?

4                   A.    Yes.

5                   Q.    Who?

6                   A.    The collective board of  
7 supervisors. Supervisor Salese.

8                   Supervisor Hahn. Those are the  
9 ones that come to mind.

10                  Q.    And how was, to your recollection,  
11 how was Sheriff Villanueva disparaging toward the  
12 collective board of supervisors?

13                  A.    His comments about how they were  
14 all women.

15                  Q.    And what did you believe -- and to  
16 be clear, do you recall him making those comments  
17 in a board of supervisors meeting or in some other  
18 forum?

19                  A.    I don't recall the exact -- I don't  
20 recall exactly about the five minutes, but I know  
21 he made those comments in many forums.

22                  Q.    And just for the record, it is true  
23 all members of the board of supervisors were women  
24 at the time he made those comments; is that fair?

25                  A.    Yes.

PAWLOWSKI, VERONICA

Page 85

1 Q. And what did you believe was  
2 inappropriate or disparaging about the reference  
3 to the fact they were all women?

4 A. It's the inference behind those  
5 comments. The inference that a board made up of  
6 five women is somehow deficient or incapable  
7 because they are women.

8 Q. Do you recall Sheriff Villanueva  
9 saying anything that led you to believe that was  
10 the inference he was intending when he referred to  
11 a board of supervisors as all women?

12 A. Yes.

13 Q. And what do you recall with respect  
14 to that?

15 A. I don't have specific recollections  
16 of specific statements.

17 Q. And just to be clear as you sit  
18 here today, do you remember anything in specific  
19 or general that led you to believe that Sheriff  
20 Villanueva intended the inference to be the board  
21 of supervisors was somehow deficient or incapable  
22 because they were women?

23 A. Can you repeat that?

24 Q. As you sit here today, do you  
25 remember any statements of Sheriff Villanueva in

1 general or in specific that leads you to believe  
2 he was intending the inference to be the board of  
3 supervisors was somehow incapable or deficient  
4 because they were all women?

5 A. Yes.

6 Q. What statements are those?

7 A. So, again, I don't remember exact  
8 statements, but there was a reference to the fact  
9 that they're called, you know, the board is always  
10 called the five kings, the five queens and so  
11 there was this thing he had at one point about how  
12 they were the five queens and those statements  
13 were made in a way that was essentially making fun  
14 of the fact that it was being held up as an  
15 accomplishment of the county that we had five  
16 women in those seats.

17 Q. Just to be clear, you believe that  
18 Sheriff Villanueva's reference to the board of  
19 supervisors being five queens was him making fun  
20 of the accomplishment of an all female board?

21 MR. TOKORO: Objection. Misstates  
22 her prior testimony about how Sheriff Villanueva  
23 was delivering that message, but you can answer  
24 again.

25 A. He would make those comments in a

PAWLOWSKI, VERONICA

Page 87

1     sarcastic manner and it's like he was making fun  
2     of them.

3                 Q.     And do you recall what forum he  
4     made those comments in a quote-unquote sarcastic  
5     manner?

6                 A.     I don't recall the exact forum  
7     because in my position I was always paying  
8     attention to the sheriff regardless of what forum  
9     he was in. So I don't remember exactly what forum  
10    a specific statement was made in.

11                Q.     And apart from the comment of five  
12    queens, any other statements that you believe led  
13    to the inference that he was being disparaging  
14    towards the board of supervisors because they were  
15    women?

16                A.     There were many and it was this --  
17    the way he addressed them, the way he spoke about  
18    them, it was all very condescending and  
19    disrespectful.

20                Q.     And do you recall, as you sit here  
21    today -- I know you say there are many, but do you  
22    recall what those disrespectful statements were?

23                A.     Not specific statements.

24                Q.     Okay. And do you recall how it was  
25    -- just to be clear, when you say there were

PAWLOWSKI, VERONICA

Page 88

1     disrespectful statements, are you referring to the  
2     statements themselves or the manner in which  
3     Sheriff Villanueva delivered them or both?

4             A.     Both.

5             Q.     And so just to be clear, do you  
6     remember any statements specifically that were  
7     disrespectful statements that were delivered in a  
8     disrespectful manner?

9             A.     I don't remember the exact  
10    statement word for word.

11            Q.     Do you remember anything about  
12    them?

13            A.     Yes.

14            Q.     What do you remember about them?

15            A.     For example, statements that  
16    supervisor Hahn somehow lacks intelligence or has  
17    achieved her position through favoritism or  
18    nepotism or general comments about decisions the  
19    board would make and then referencing them as  
20    being boneheaded or stupid.

21                    Again, it was just a general  
22    minimizing of these five women.

23            Q.     Do you believe it's fair to say  
24    that Sheriff Villanueva disagreed with the board  
25    of supervisors politically on a number of

PAWLOWSKI, VERONICA

Page 89

1 occasions?

2 A. Yes.

3 Q. Just to be clear, other than -- I'm  
4 sorry, any other examples that you remember of  
5 Sheriff Villanueva being disrespectful to the  
6 board of supervisors?

7 A. Yes.

8 Q. What are those?

9 A. Are you talking about the board as  
10 a collective group or individual numbers?

11 Q. At this point collective.

12 A. No. As I've stated it was a lot of  
13 general condescending and disrespectful tones and  
14 statements about the collective five of them.

15 Q. What specifically, if anything, do  
16 you recall Sheriff Villanueva saying that you  
17 believe was disparaging and inappropriate about  
18 Supervisor Hahn?

19 A. As I mentioned, statements alluding  
20 to her being less than intelligent and not  
21 deserving of her position.

22 Q. And do you recall any statements of  
23 Sheriff Villanueva attributing her lack of  
24 intelligence to the fact that she's a woman?

25 A. The implication was there.



PAWLOWSKI, VERONICA

Page 90

1 Q. And that is an implication that you  
2 drew, is that fair to say?

3 A. I'm sorry, can you repeat it?

4 Q. Did you draw -- I'll rephrase that.

5 Did you draw the implication that  
6 Sheriff Villanueva was saying she was less than  
7 intelligent because she's a woman?

8 A. Yes.

9 Q. And what, if anything, did Sheriff  
10 Villanueva ever say that led you to believe that  
11 he intended the implication to be Sheriff  
12 Hahn[sic] is less than intelligent because she's a  
13 woman?

14 A. Can you repeat that?

15 Q. What, if anything, did Sheriff  
16 Villanueva say or do that led you to believe he  
17 intended that implication?

18 A. Again, it was the way he spoke  
19 about her.

20 Q. And what about the way he spoke  
21 about her led you to believe that was an intended  
22 implication?

23 A. It was rude and condescending and  
24 minimizing her qualifications.

25 Q. And what qualifications did

PAWLOWSKI, VERONICA

Page 91

1 Ms. Hahn have that you believe Sheriff Villanueva  
2 was minimizing?

3 A. Maybe the better word is  
4 accomplishment. She had accomplished a lot in the  
5 various positions that she's had throughout her  
6 career.

7 Q. And what accomplishments did you  
8 believe Sheriff Villanueva was minimizing?

9 A. So Supervisory Hahn had been a  
10 member of Congress, a supervisor for the largest  
11 county in the country and yet he referred to her  
12 as if she was stupid.

13 Q. Just to be clear, do you think, in  
14 general, it's inappropriate or disparaging to  
15 refer to elected members as stupid?

16 A. I believe it's inappropriate to  
17 refer to anyone as stupid based on the fact that  
18 they're a woman.

19 Q. Understood.

20 And just to be clear, you drew the  
21 inference that it was because she was a woman and  
22 not because she was doing things as an elected  
23 official that he disagreed with; is that fair to  
24 say?

25 MR. TOKORO: Vague and ambiguous as

PAWLOWSKI, VERONICA

Page 92

1 to what you are referring to. Objection.

2 You can answer if you understand.

3 A. I don't understand the question.

4 Q. You drew the implication that  
5 Sheriff Villanueva thought Janis Hahn was less  
6 than intelligent because she's a woman as opposed  
7 to disagreeing with her politically; is that fair?

8 A. It is fair to say that he disagreed  
9 with her politically.

10 It is also fair to say that I don't  
11 think that that's the reason he put her down the  
12 way he did.

13 Disagreeing with someone  
14 politically when you are an elected official, is  
15 part of your job, that is fine.

16 Q. And besides, I think you -- sorry,  
17 apart from -- just to go back -- apart from saying  
18 she was less than intelligent and, broadly  
19 speaking, minimizing either her qualifications or  
20 accomplishments, anything else you believe that  
21 Sheriff Villanueva said that was disparaging or  
22 inappropriate towards Ms. Hahn?

23 A. Not that I recall at the moment.

24 Q. And do you remember anything  
25 specifically that Sheriff Villanueva said that was

PAWLOWSKI, VERONICA

Page 93

1     disparaging about Hilda Salese?

2                   A.     Yes.   The most offensive one of all  
3     actually.

4                   Q.     And what was that?

5                   A.     It was when he called La Malinche.

6                   Q.     Do you speak Spanish?

7                   A.     Yes.

8                   Q.     Are you a native speaker of  
9     Spanish?

10                  A.     I was raised speaking both  
11     languages at the same time and I'm fluent in  
12     Spanish.

13                  Q.     What is your understanding of what  
14     -- and I'm sorry for my pronunciation --  
15     La Malinche means, to your understanding?

16                  A.     To my understanding, it's a  
17     sell-out.   Like a traitor.

18                  Q.     And are you aware of any historical  
19     connotations of being a sell-out or a traitor?  
20     Like was there a specific historical person that  
21     had that term applied to them?

22                  A.     Yes.   I know that there was a  
23     specific historical person, I don't know the  
24     entire history.   My understanding of the word  
25     comes from being raised in a Mexican community by

PAWLOWSKI, VERONICA

Page 94

1 a bunch of Mexican women.

2 Q. So just to be clear, your  
3 understanding, from your experience being raised  
4 in a Mexican community by Mexican women is that  
5 term refers to someone who's a sell-out or a  
6 traitor; is that right?

7 A. Yes. A sell-out, a traitor, but  
8 it's more than that. It's like you are a sell-out  
9 and a traitor in kind of like a, almost like a --  
10 it's like a gross reference, I don't know how else  
11 to say it.

12 Q. It's a sell-out and a traitor and  
13 it's considered disparaging at the minimum; would  
14 that be a fair way to put it?

15 A. Yes.

16 Q. And why do you believe it was --  
17 first off, do you recall why -- sorry.

18 Do you recall any reason Sheriff  
19 Villanueva gave -- whether you agreed with the  
20 reasons or not -- as to why he referred to Hilda  
21 Salese that way?

22 A. I don't remember.

23 Q. And do you recall, other than the  
24 fact he referred to her that way, do you recall  
25 anything he said in referring to her as that term?

1           A.    You know, honestly I don't remember  
2   because him using that term publically against an  
3   elected official, again, with her qualifications  
4   and background, it was so shocking to me, that I  
5   don't remember all the details and sort of minutia  
6   about why he did it because there was no reason  
7   for him to do that that would be reasonable or  
8   understandable. So I don't remember. It doesn't  
9   matter to me.

10           Q.   And why did you believe it was  
11   inappropriate for him to say that?

12           A.    Because again, I consider it to be  
13   so offensive and disparaging in our culture that I  
14   don't see any legitimate reason why the elected  
15   sheriff of LA County would use that word in  
16   reference to another elected official.

17           Q.    Any other reason other than that?

18           A.    It is specifically a put-down of  
19   women. Right. You don't call a man a  
20   La Malinche. You don't do that. It's  
21   specifically a put-down of a women.

22                    So again, in the context of  
23   everything that was going on at the time and just  
24   this chauvinistic rude demeanor that he had toward  
25   the board of supervisors, it was just like, I just

PAWLOWSKI, VERONICA

Page 96

1 remember feeling in that moment that it had just  
2 been ratcheted up for no -- like for no  
3 justifiable reason that I could think of.

4 Q. And what's your basis for your  
5 understanding that it's specifically a put-down of  
6 women?

7 A. That is my understanding based on  
8 my community, my family and how it's used in my  
9 community.

10 Q. So just to be clear, your  
11 understanding in your community and your family,  
12 it's not a general term of being a traitor or a  
13 sell-out, it's specifically related to a woman  
14 being that?

15 A. Yes, that is my understanding.

16 Q. Do you happen to know how Sheriff  
17 Villanueva identifies ethnically?

18 A. I believe he identifies -- I mean,  
19 he's from Puerto Rico and I think that he  
20 identifies as Latino.

21 Q. And do you have -- do you know one  
22 way or another if he also grew up speaking  
23 Spanish?

24 A. I don't know.

25 Q. Do you know if there is any

PAWLOWSKI, VERONICA

Page 97

1 community definition in Puerto Rico, as opposed to  
2 Mexico, of the term La Malinche?

3 A. I don't know.

4 Q. And is there any other way that you  
5 believe Sheriff Villanueva was disparaging or  
6 inappropriate toward Supervisor Salese other than  
7 the use of that term?

8 A. Again, there was a general rudeness  
9 and disparaging attitude toward all five of them  
10 but I don't remember anything other specific about  
11 supervisor Salese.

12 Q. And is there anything -- we've been  
13 talking about the board of supervisors and I think  
14 we mentioned the justice deputies at the  
15 beginning.

16 Just to go back, do you recall  
17 anything specifically related to the justice  
18 deputies that you believed Sheriff Villanueva said  
19 that was disparaging or inappropriate?

20 A. Yes.

21 Q. What is that?

22 A. So justice deputies, he also  
23 referred to as a bunch of women.

24 Well, actually I wouldn't even say  
25 women, because with that he made comments about us



PAWLOWSKI, VERONICA

Page 98

1 being 20 something year old woke, novices who  
2 didn't understand what we were doing and had no  
3 qualifications, that he could discern of, for the  
4 positions that we had.

5 I remember him referring to some of  
6 our policies as a bureaucratic orgy of wokeness,  
7 which is gross.

8 And, yeah, he definitely at some  
9 point started to have the justice deputies on his  
10 radar for sure.

11 Q. And so just to take that, do you  
12 refer -- do you recall Sheriff Villanueva  
13 referring collectively to the justice deputies as  
14 all women?

15 A. Yes.

16 Q. Do you recall what forum he said  
17 that in?

18 A. No.

19 Q. Do you recall if he ever said that  
20 during a board of supervisors' meetings, one of  
21 the public meetings?

22 A. I don't remember.

23 Q. And you also said he referred to  
24 you as collectively as 20 something woke; is that  
25 your recollection?

PAWLOWSKI, VERONICA

Page 161

1 else.

2 Q. And after that conversation, did  
3 you ever discuss Esther Lim's complaint with  
4 Esther Lim again?

5 A. I don't remember.

6 Q. At some point in time, were you  
7 interviewed with respect to Esther Lim's  
8 complaint?

9 A. Yes. Yes, I was.

10 Q. Do you recall the name of who  
11 interviewed you?

12 A. I don't.

13 Q. Prior to being interviewed --  
14 sorry.

15 Apart from Esther Lim but prior to  
16 the interview, did you discuss Esther Lim's  
17 complaint with anyone else?

18 A. Oh. I'm sorry, you froze and I  
19 just missed that entire question.

20 Q. That's fine.

21 Prior to being interviewed, but  
22 after Esther Lim told you she had filed the  
23 complaint, did you discuss Esther Lim's complaint  
24 with anyone else?

25 A. Yes.

PAWLOWSKI, VERONICA

Page 162

1 Q. Who did you discuss it with?

2 Sorry. You froze as well, I don't  
3 know who it is, but my question was: Who did you  
4 discuss it with?

5 A. My family.

6 Q. And was there a reason why you  
7 discussed it with your family?

8 A. Yes.

9 Q. What was that reason?

10 A. I was scared.

11 Q. And what were you scared about?

12 A. So the sheriff had targeted Esther  
13 in a very personal way and up until the time of  
14 this complaint, I safely could assume that he  
15 didn't have me personally on his radar.

16 So when she told me that she filed  
17 this complaint and listed me as a witness, I  
18 immediately became fearful that somehow that would  
19 put me on his radar.

20 So I went to my family to explain  
21 there's this complaint that's been filed against  
22 the sheriff, I don't know what that means, I'm  
23 listed as a witness, I don't know what that means  
24 for me. And I'm sorry in advance if this causes  
25 any, you know, repercussions for us as a family.

Express Deposition Services - Scheduling@expressdeposition.com  
(888)286-4226

1	CERTIFICATE
2	OF
3	CERTIFIED SHORTHAND REPORTER
4	* * * *
5	
6	
7	The undersigned Certified Shorthand
8	Reporter of the State of California does hereby
9	certify:
10	That the foregoing Deposition was taken
11	before me at the time and place therein set forth,
12	at which time the witness was duly sworn by me.
13	That the testimony of the witness and
14	all objections made at the time of the Deposition
15	were recorded stenographically by me and were
16	hereafter transcribed, said transcript being a
17	true and correct copy of the proceedings thereof.
18	In witness whereof, I have subscribed my
19	name, this date: March 17, 2025.
20	
21	
22	
23	<i>Lynn Ann Waters</i>
24	<u>LYNN ANN WATERS, CSR NO. 14432</u>
25	

# EXHIBIT 7

**CERTIFIED COPY**

1605 W. Olympic Blvd., Suite 800 Los Angeles, CA 90015

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ALEX VILLANUEVA vs SHERIFF'S DEPARTMENT

CHRISTINE DIAZ-HERRERA, ESQ

March 05, 2025

Cheryl L. Marquis CSR No. 6731, Job No. 6456

1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

3

4 ALEX VILLANUEVA, ) NO.  
5 Plaintiff, ) 2:24-CV-04979 SVW (JCx)

6 vs. )

7 )

8 )

9 )

10 )

11 )

12 )

13 )

14 )

15 )

16 )

17 )

18 )

19 )

20 )

21 )

22 )

23 )

24 )

25 )

26 )

27 )

28 )

29 )

30 )

31 )

32 )

33 )

34 )

35 )

36 )

37 )

38 )

39 )

40 )

41 )

42 )

43 )

44 )

45 )

46 )

47 )

48 )

49 )

50 )

Deposition of CHRISTINE DIAZ-HERRERA, ESQ., taken

on behalf of the Plaintiff remotely via Zoom

Videoconferencing, commencing at 10:40 A.M. on

Wednesday, March 5, 2025 before Cheryl L. Marquis,

Certified Shorthand Reporter No. 6731.

1 APPEARANCES:

2 For Plaintiff:

3 SHEGERIAN & ASSOCIATES, INC.  
4 BY: ALEX DiBONA  
ARTHUR ADAMIAN  
Attorneys at Law  
5 11520 San Vicente Boulevard  
Los Angeles, California 90049  
6 (310) 860-0770  
ADiBona@Shegerianlaw.com  
7

8 For Defendants:

9 MILLER BARONDESS, LLP  
10 BY: JASON H. TOKORO  
Attorney at Law  
2121 Avenue of the Stars  
11 Suite 2600  
Los Angeles, California 90067  
12 jtokoro@millerbarondess.com

13 Also Present:

14 ALEX VILLANUEVA  
15 S. WILLIAMSON  
16

17

18

19

20

21

22

23

24

25

INDEX



1 honestly don't remember. It's possible my first one  
2 could have been in 2021. For sure, 2022 I had conducted  
3 investigations for the county.

4 Q And do you have any understanding of how it  
5 came to be that the County hired you or is it the County  
6 hired your law firm, who then chose you?

7 A The county hired my law firm and they chose me.

8 Q And do you know who in the County was  
9 responsible for hiring your law firm?

10 A I don't.

11 Q And do you know how the County became aware  
12 that your law firm was -- excuse me -- was able to be  
13 hired to conduct such investigations?

14 A No, I don't.

15 Q At Sanders Roberts at the time that you were  
16 first asked to do an investigation on behalf of the  
17 County, who at the firm asked you to do it?

18 A I don't remember.

19 Q Did you have a direct report at Sanders Roberts  
20 in 2021 or 2022?

21 A I worked closely with two different attorneys.

22 Q And what are those attorneys' names?

23 A Shawn Thomas, and Reginald Roberts.

24 Q At the time, what was Mr. Thomas' position with  
25 the firm?

1 procedure -- I'm just asking if you have seen it at this  
2 point.

3 A Yes.

4 Q And this is the admonition that the Sheriff's  
5 Department gave you?

6 A I don't recall.

7 Q Do you recall one way or another if this is how  
8 you began the investigations -- sorry. Strike that.

9 Do you recall one way or another if this  
10 procedure is how you began your interviews with the  
11 witnesses with respect to the Sheriff Alex Villanueva  
12 investigation?

13 A That looks like my typical admonition that I  
14 have been giving for the last 15 years.

15 Q And do you see here there is various names?

16 A Yes.

17 Q And did you interview Kyla Coates on or around  
18 August 4, 2022?

19 A Yes.

20 Q And did you interview Esther Lim on or about  
21 July 28th, 2022?

22 A Yes.

23 Q And did you interview Veronica Pawlowskiski on  
24 or about August 1st, 2022?

25 A Yes.

1 Q Did you have -- excuse me.

2 When you were going to interview Alex -- sorry.

3 Strike that.

4 If you had the chance to interview Alex

5 Villanueva, did you have a plan to interview him about

6 both allegations at the same time, or did you plan on

7 splitting them up?

8 A I would have done it at the same time, given

9 that I don't know his schedule or whether he would have

10 been available to meet with me more than once.

11 MR. DiBONA: All right. I'm going to share

12 Exhibit 4.

13 (Exhibit 4 was marked for identification

14 and is attached hereto.)

15 Q BY MR. DiBONA: Do you see Exhibit 4 on your

16 screen?

17 A Yes.

18 Q I do see -- do you recall sending this e-mail

19 on or about February 8th, 2023 to Sheriff Villanueva?

20 A Yes.

21 Q And just for the record, it states,

22 "Good morning, Mr. Villanueva,

23 I want to follow up regarding my request to

24 schedule an interview with you. However, pursuant

25 to California Rules of Professional Conduct Rule

1 2100, I am unable to communicate with you directly  
2 if you are currently represented by an attorney. If  
3 you have an attorney representing you in this  
4 matter, if so, please provide me with their contact  
5 information so I may speak to them.

6 Thank you."

7 Did I read that correctly?

8 A Yes.

9 Q And do you recall the first time you sent a  
10 request to interview Sheriff Villanueva?

11 A Vaguely, yes.

12 Q Do you recall would that have been a letter he  
13 received while he was Sheriff from the Sheriff's  
14 Department?

15 A No. I believe it was an e-mail from me to his  
16 Chief of Staff, who I don't remember his first name, but  
17 the last name was Satterfield.

18 Q Do you recall when you sent that e-mail to John  
19 Satterfield?

20 A I don't, but it would have been shortly after  
21 -- obviously, I don't -- I don't remember.

22 Q And sorry, I shouldn't have -- do you have a  
23 recollection, one way or another, if it's John  
24 Satterfield, or I believe you said you don't know his  
25 first name -- remember his first name, is that fair?

1 A I don't remember his first name. I remember  
2 his last name being Satterfield.

3 Q And I think you answered this, so I apologize,  
4 did you ever receive a response from Mr. Satterfield?

5 A No.

6 Q When -- do you recall when the first time you  
7 ever sent an e-mail directly to Mr. Villanueva to  
8 interview him?

9 A I am actually not sure that I did e-mail him  
10 directly. I believe I received an e-mail from him.

11 Q So just to be clear, you recall the first time  
12 Mr. Villanueva reaching out regarding an interview  
13 directly is him e-mailing you?

14 A Correct.

15 Q And do you recall when you received that e-mail  
16 from him?

17 A I don't.

18 MR. TOKORO: I'm just going to object that the  
19 document you are showing her speaks for itself.

20 Q BY MR. DiBONA: Do you see at the bottom, there  
21 is an e-mail from Alex Villanueva on or about  
22 January 12, 2023?

23 A I see that.

24 Q Sorry, let me go back. Sorry, let me scroll  
25 down. Sorry. The document even before that, which is

1 COLA001888, do you recall receiving this e-mail?

2 A Yes.

3 Q All right. And do you see this e-mail is  
4 January 9th, 2023?

5 A Yes.

6 Q And looking at it, do you believe this is the  
7 e-mail that you were referring to with Mr. Villanueva  
8 with respect to your request for an interview?

9 A Yes.

10 Q And this is -- to your recollection, this is  
11 the first time you ever had any direct communication  
12 with former -- with at this time former Sheriff Alex  
13 Villanueva, is that fair?

14 A Yes.

15 Q Is it your recollection that Sheriff  
16 Villanueva, the re-election for Sheriff was November of  
17 2022?

18 A Yes.

19 Q And so January 9th of 2023, he would have been  
20 out of office at this time, is that your understanding?

21 A Yes.

22 Q And the reference is I -- I'm sorry. The  
23 statement is,

24 "I received two certified letters regarding  
25 interview requests for incidents that allegedly

1 happened in March of last year. In order to  
2 properly respond, I will ask you to submit your  
3 questions in writing after providing a brief  
4 description of what the allegations are, and then I  
5 will reply with counsel. That is the first I have  
6 heard of anyone reaching out to me, so please use  
7 this e-mail for all communications."

8 Did I read that correctly?

9 A Yes.

10 Q Did you believe there was anything  
11 inappropriate about former Sheriff Alex Villanueva  
12 asking you to submit your questions in writing?

13 A Can you define "inappropriate"?

14 Q Did you consider it an improper request that he  
15 was making of you while you were trying to investigate  
16 these allegations?

17 A I don't know that I would use the word  
18 "improper," but I would say that in 15 years of doing  
19 investigations, I have never had someone ask me for the  
20 questions, and I have never received a request like that  
21 in 15 years.

22 Q And in 15 --

23 A It wasn't usual.

24 Q In 15 years, had you ever made a request to  
25 interview a former elected official?

1 A No.

2 Q And in the previous 15 years, had you ever  
3 investigated a County Sheriff of any kind?

4 A A County Sheriff, no.

5 Q By the way, as I get the next exhibit, I'm  
6 going to ask you, there is a reference -- Mr. Villanueva  
7 references two certified letters. Did you send those  
8 letters -- sorry. Did you send the certified letters  
9 that are referenced?

10 A I did not.

11 Q Do you know who did?

12 A I do not know.

13 Q Sorry. It should come through any moment.  
14 (Exhibit 5 was marked for identification  
15 and is attached hereto.)

16 All right. Do you see the document on your  
17 screen?

18 A Yes.

19 Q Okay. This is COLA001890 and it goes to 1893.

20 Do you recall receiving -- sorry, sending this  
21 e-mail to former Sheriff Alex Villanueva on February 9,  
22 2023?

23 A Yes.

24 Q And for the record, what does POE stand for?

25 A Policy of Equity I believe, I think I was



1 referencing the CPOE.

2 Q And there is a reference to which Policy of  
3 Equity he's alleged to have violated, is that correct?

4 A Yes.

5 Q And there is no reference to who was making the  
6 allegations, is that right?

7 A Yes.

8 Q And was there any reason why you didn't  
9 reference either Esther Lim or Max Huntsman in this  
10 e-mail?

11 A He asked for the allegations and I gave them to  
12 him.

13 Q Understood. Did you consider -- in your  
14 opinion, would there have been anything inappropriate if  
15 you said -- if you used the names of who was saying that  
16 he violated the policies of equity?

17 A It's not typically my practice to include that  
18 information when someone is asking me for the  
19 allegations.

20 Q And is there any reason it's part of your  
21 practice?

22 A Again, I was asked for the allegations.  
23 Provided them. They are there.

24 Q Understood. My question was just a little bit  
25 different. You said it was part of your practice, and I

1 understand the answer. Is there a particular reason you  
2 can articulate that it's part of your practice?

3 A For the purposes of informing him what the  
4 allegations are against him, it's not needed.

5 Q And did anyone in the Sheriff's Department ever  
6 tell you not to say the names of Esther Lim or Max  
7 Huntsman to Sheriff Villanueva prior to the interview?

8 A No.

9 Q And so just to be clear, the reason you didn't  
10 mention the names of Esther Lim or Max Huntsman is  
11 because it's not your practice, and you didn't believe  
12 it was necessary to answer his question. Do I have that  
13 right?

14 A He asked for the allegations. I gave him the  
15 allegations that were potentially against him. I gave  
16 him the information that was requested.

17 Q And any other reason other than that, why you  
18 didn't give the names of Esther Lim or Max Huntsman to  
19 him in the e-mail?

20 A He asked for the allegations. I gave him the  
21 information regarding the allegations.

22 Q Miss Diaz-Herrera, not to go round and round, I  
23 understand your answer. What I just want to make sure  
24 is, I want to make sure I have all your reasons. I  
25 think you gave me two or three, depending on how you

1 count. I'm just wondering if you had any more than  
2 that?

3 MR. TOKORO: You have asked her this question  
4 twice now. She's answered it twice.

5 You can answer it one more time, Christine, and  
6 we'll move on.

7 THE WITNESS: I gave him the information I  
8 believed was relevant to his request.

9 Q BY MR. DiBONA: Do you see Exhibit 6 on your  
10 screen?

11 (Exhibit 6 was marked for identification  
12 and is attached hereto.)

13 A Yes.

14 Q So Exhibit 6 is COLA001894, and do you recall  
15 receiving this response from then former Sheriff Alex  
16 Villanueva on or about February 9, 2023?

17 A Yes.

18 Q It says,

19 "I'm not concerned about what your practices  
20 may be, particularly given the challenging optics of  
21 making a former sheriff the subject of an  
22 administrative investigation."

23 First, did I read that correctly?

24 A Yes.

25 Q It goes on,

1 "This is troubling on so many levels, and while  
2 I am more than happy to cooperate with you, it will  
3 be on my terms. Please advise how you wish to  
4 proceed.

5 Alex."

6 Did I read that correctly?

7 A Yes.

8 Q Excuse me. Were you involved in any  
9 determination if there was still jurisdiction to conduct  
10 an investigation of Alex Villanueva when he was no  
11 longer with the Sheriff's Department?

12 A No.

13 Q And were you involved in any determination of  
14 whether the statute of limitations on the allegation had  
15 run?

16 A No.

17 Q I think earlier you made a reference to POBAR.  
18 Is that the Peace Officers Bill of Rights, to your  
19 understanding?

20 A Yes.

21 Q And did you make -- or were you involved in any  
22 determination, whether the Peace Officers Bill of Rights  
23 was complied with, with respect to the investigation  
24 into the former Sheriff Alex Villanueva?

25 A I don't think I understand your question.

1 Q Were you asked, in the course of your  
2 investigation to do any investigation into whether the  
3 Peace Officers Bill of Rights would be complied with,  
4 with respect to any proposed discipline with respect to  
5 Alex Villanueva?

6 A I have zero impact or -- I have zero to do with  
7 any type of discipline or anything like that. I would  
8 never have any kind of impact on that or any kind of  
9 opinion on that. I don't -- I don't advocate for  
10 discipline. I don't make any recommendations for  
11 discipline. I have nothing to do with it.

12 Q Sorry, I'm just marking the next exhibit.  
13 Do you see it on your screen?  
14 (Exhibit 7 was marked for identification  
15 and is attached hereto.)

16 A Yes.

17 Q Exhibit 7 is COLA001909, and it goes to 1914.

18 Do you recall receiving this e-mail from  
19 Mr. Villanueva on or about March 6, 2023, the one at the  
20 top -- or I'm sorry, strike that.

21 Do you recall sending this e-mail to Sheriff  
22 Villanueva on or about March 6, 2023?

23 A Yes.

24 Q All right. And is it fair to say in your first  
25 paragraph you are saying the subject of an investigation

1 does not get to know the questions he or she will be  
2 asked in your interview. Do you see that?

3 A Yes.

4 Q And do you recall -- this appears to be in  
5 response to an e-mail sent by Alex Villanueva on March  
6 26, 2023. Do you see that?

7 A Yes.

8 Q And do you recall receiving this e-mail from  
9 Sheriff Villanueva on that date and time?

10 A Yes.

11 Q Okay. And in the report it says,  
12 "Your response only confirms my suspicion. For  
13 the record, there were several incidents that  
14 occurred during the McDonald administration that  
15 merited questioning him, but it would have been  
16 wildly inappropriate to make him the subject of an  
17 administrative investigation and we never did. Your  
18 actions are unethical and without legal authority or  
19 precedent. Thank you."

20 Did I read that correctly?

21 A Yes.

22 Q And are you aware, one way or the other --  
23 sorry. Let me back up for a second.

24 Did you have an understanding that Jim McDonald  
25 was the Sheriff before Alex Villanueva?

1 Q Does this Allegation 1, does this comport with  
2 your understanding of what you were investigating with  
3 respect to Max Huntsman?

4 A Yes.

5 Q And did you interview Max Huntsman on or about  
6 July 21, 2022?

7 A Yes.

8 Q And was that interview recorded?

9 A Yes.

10 Q Did, by the way, you make any credibility  
11 determinations about what Max Huntsman told you during  
12 that interview?

13 A No.

14 Q Did you ever make any credibility  
15 determinations about Esther Lim in her interview with  
16 you?

17 A Since I didn't complete the investigation, no,  
18 I didn't.

19 Q And did you ever make any credibility  
20 determinations regarding Kyla Coates with respect to  
21 anything she told you?

22 A Can you explain what you mean by a "credibility  
23 determination"?

24 Q Yes, I mean did you ever come to an opinion one  
25 way or the other, that this person is either telling the

1 truth or this person is not telling the truth, and there  
2 may have been more than one, but that's what I mean by  
3 credibility determinations.

4 A So can you ask me the question about Esther  
5 again?

6 Q Yes. Did you ever make any credibility  
7 determinations with respect to Esther Lim and anything  
8 she told you during the investigation?

9 A I interviewed her, and then I went to the  
10 Facebook Live statements as well as, you know, other  
11 things that were available that I could find, and was  
12 able to determine that comments that she said had been  
13 made had in fact been made. So in the sense of was I  
14 able to determine if she had been telling the truth,  
15 some of the comments that she made, certainly I could  
16 see she had told the truth, yes.

17 Q And was there anything that you determined that  
18 Esther Lim told you that was not the truth for whatever  
19 reason?

20 A Not that I could recall.

21 Q And I will ask it again. With respect to Kyla  
22 Coates, did you make any credibility determinations  
23 regarding Miss Coates?

24 A Again, based on how you have defined it for me,  
25 I look -- from her allegations that she made, I was able



1 to independently verify with Facebook Live streams that  
2 some of what she had said I was able to see in the  
3 Facebook Live stream, so I was able to see that she was  
4 truthful and that, like for example, you know, that she  
5 had -- some of the comments she made were in fact in the  
6 Facebook Live TV stream, so you could see that she had  
7 told the truth.

8 Q And did you make any credibility determinations  
9 that Miss Coates was not telling you the truth regarding  
10 anything?

11 A I did not find evidence that showed she had  
12 lied about something specific, no.

13 Q And did you make any credibility determinations  
14 with respect to Veronica Pawlowski?

15 A Again, in the same way, you know, there was  
16 specific comments that she made, and then referring to  
17 the Facebook Lives, you know, those are verifiable,  
18 right? You can look and see whether or not what they  
19 said was said.

20 Q And just same question, I will redefine  
21 credibility. Did you ever make any credibility  
22 determinations with respect to Max Huntsman?

23 A So, for example, Max made specific statements  
24 regarding comments that were made on KFI. I was able to  
25 pull the interview on KFI and listen to it and hear that

1 what Max had said had been said on the KFI broadcast.  
2 Likewise, I believe there was an L.A. Times article. I  
3 was able to pull the L.A. Times article and see what was  
4 said was in the L.A. Times article. So with regards to  
5 was I able to determine if what he had said was true,  
6 there are comments that he made or allegations that he  
7 made that I was able to verify were true in the KFI  
8 interview and in the L.A. Times interview.

9 Q And were you ever able to make a credibility  
10 determination that something Max Huntsman said was not  
11 the truth?

12 A I did not find any evidence that Max Huntsman  
13 had lied about something he said to me.

14 Q And I'm sorry, under the section on background,  
15 are you able to tell me, one way or another, if you  
16 wrote this section?

17 A I believe so, yes. And can I say referring  
18 back to earlier in the day, I think I got a little  
19 confused with how you were going back and forth, and I  
20 think I got confused that you were showing me a report  
21 versus notes, and so I just wanted to point that out  
22 that I think I got a little confused when we were  
23 looking at those documents, because now I can see like,  
24 for example, this is the report, right, but I think  
25 previous, earlier in the day, you had also -- you were

1 Q All right. If you could go to page 70, which  
2 is COLA002104.

3 A Is that page 70?

4 Q Yes, it's 70 on the PDF. it's Bates numbered  
5 2104. So whichever one is easier for you.

6 A Okay. Yes, I can see that now.

7 Q Have you seen this portion of the document  
8 before?

9 A Yes.

10 Q And is this something you received when you  
11 began your investigation into Max Huntsman?

12 A Yes.

13 Q Just a moment. If you go to page 45 on the  
14 PDF, which is COLA 002079.

15 MR. TOKORO: Alex, can you put it up on the  
16 screen? Because I don't have it open.

17 MR. DiBONA: Yes.

18 MR. TOKORO: Thank you.

19 THE WITNESS: 45, and you said it's zero --  
20 what is it?

21 Q BY MR. DiBONA: 2079.

22 A Okay. Yeah, I have it.

23 Q Do you see towards the middle of the section of  
24 the transcript it says, "It might be..."?

25 A Yes.

1 Q And just for the record, it says,  
2 "It might be if he had presented me as an  
3 Aryan, but he didn't, you know. So that's why when  
4 he first did it, my take on it is he was trying to  
5 imply I was Jewish. And that would be what I was --  
6 that's what I thought he was doing. I may not have  
7 been correct about that, but that's just how I took  
8 it."

9 Did I read that correctly?

10 A I'm sorry. What were you saying again?

11 Q My question was did I just read that portion of  
12 the transcript correctly?

13 MR. TOKORO: I'm just going to make an  
14 objection that it's incomplete. You are only reading  
15 her the first half of that paragraph.

16 THE WITNESS: I don't know what to say. You  
17 read the words on the page. I don't know that I have  
18 any special knowledge, other than what you just read.

19 Q BY MR. DiBONA: Do you have a recollection of  
20 Mr. Huntsman saying that in your interview with him?

21 MR. TOKORO: Once again, it's incomplete. You  
22 are reading her a portion of a paragraph rather than the  
23 entirety of it.

24 THE WITNESS: Yes, I recall him saying these  
25 words.

1 Q BY MR. DiBONA: Ms. Diaz-Herrera, do you  
2 understand you are still under oath?

3 A Yes.

4 Q Is there any reason you can't continue to give  
5 your best testimony?

6 A No.

7 Q As you sit here today, do you believe any part  
8 of your testimony needs to be changed for whatever  
9 reason?

10 A No.

11 MR. DiBONA: I don't have any further  
12 questions. Do you, Counsel?

13 MR. TOKORO: I do.

14 EXAMINATION

15 BY MR. TOKORO:

16 Q Miss Diaz-Herrera, I just have a few questions  
17 for you to follow up on some of the things that you were  
18 asked about by Mr. DiBona.

19 To be clear, when you were conducting your  
20 investigation, did any member of the County Board of  
21 Supervisors give you any instructions on how that  
22 investigation was to be conducted?

23 A No.

24 Q Did any member of the County Board of  
25 Supervisors communicate with you in any way, shape or

1 form about your investigation into either Esther Lim or  
2 Max Huntsman?

3 A No.

4 Q Did Supervisor Solis have any involvement in  
5 your investigation into either Max Huntsman or Esther  
6 Lim's complaints?

7 A No.

8 Q Did Janice Hahn, Supervisor Hahn have any  
9 involvement whatsoever in either of your investigations?

10 A No.

11 Q Did Sheriff Luna, once he became Sheriff in  
12 November of 2022, have any involvement in your  
13 investigation into either the Huntsman or Lim  
14 complaints?

15 MR. DiBONA: Objection. Lack of foundation.  
16 Leading.

17 THE WITNESS: No.

18 Q BY MR. TOKORO: Did Sheriff Luna ever  
19 communicate with you in any way, shape or form about how  
20 you were conducting either the Huntsman or Lim  
21 investigations?

22 MR. DiBONA: Same objections. Form.

23 THE WITNESS: No.

24 Q BY MR. TOKORO: Have you ever spoken with  
25 Sheriff Luna about either the Huntsman or Lim

1 investigations?

2 A I have never spoken with Sheriff Luna ever.

3 Q Now I think you were asked some questions about

4 the distributions or the information that you were given

5 by the department at the beginning of your

6 investigations, but I want to make sure we make the

7 record clear.

8 Did anyone from the department direct you on

9 how to conduct the Huntsman investigation?

10 A Are you talking about the Sheriff's Department?

11 Q Yes.

12 A Nobody directed me how to conduct my

13 investigation.

14 Q Did anyone from the Sheriff's Department direct

15 you on how to conduct the investigation into Esther

16 Lim's complaint?

17 A No.

18 Q Did anyone from the Sheriff's Department direct

19 you on what questions to ask in either of those two

20 investigations?

21 A No.

22 Q Did anyone from the Sheriff's Department direct

23 you on who to interview as part of either of those

24 investigations?

25 A No.

1 Q Did anyone from the Sheriff's Department direct  
2 you on what evidence to collect or not collect in  
3 connection with either of those investigations?

4 A No.

5 Q Now, one of the things you mentioned,  
6 Mr. DiBona was showing you a number of e-mails that you  
7 had with Mr. Villanueva after he was no longer in  
8 office.

9 I want to talk about the period before he lost  
10 the election to Sheriff Luna. You mentioned, I think --  
11 I wrote it down, that you repeatedly tried to set up an  
12 interview with him, is that accurate?

13 A Yes.

14 Q And can you tell us, I think you mentioned this  
15 started around the time when you received the complaint  
16 or you received the investigation in June of 2022. But  
17 can you just tell us what you did specifically to try to  
18 set up an interview with him while he was still in  
19 office?

20 A I e-mailed his Chief of Staff, Mr. Satterfield,  
21 and I tried to set up an interview with him, I believe  
22 multiple times. I did not receive any response. Then  
23 later, Sheriff Villanueva himself e-mailed me directly,  
24 and then I interacted with him in trying to schedule an  
25 interview.



1 Q And was your understanding from the e-mail that  
2 Sheriff Villanueva sent you that he had received two I  
3 believe certified letters asking you to get in touch  
4 with him?

5 MR. DiBONA: Objection. Leading. Form.

6 THE WITNESS: Yes.

7 Q BY MR. TOKORO: Okay. So prior to that,  
8 though, John Satterfield or Deputy Satterfield had never  
9 responded to any of your requests to set up an interview  
10 with Sheriff Villanueva, is that fair?

11 A Yes, that's accurate.

12 Q Okay. And you understood that Deputy  
13 Satterfield was Mr. Villanueva's Chief of Staff at the  
14 time?

15 A Yes, that's what I believed.

16 Q Now, Mr. Villanueva has alleged in this case  
17 that the department concluded its investigations into  
18 Mr. Huntsman and Miss Lim's complaints in July of 2022.

19 Is that true?

20 A No, I had just started my investigations so  
21 that couldn't be accurate.

22 Q In fact, in August of 2022, that's when you  
23 first interviewed Miss Pawlowski and Miss Coates,  
24 correct?

25 A Correct.

1 Q And you continued to try to interview

2 Mr. Villanueva even after August of 2022, is that right?

3 A Yes.

4 MR. DiBONA: Objection to form.

5 Q BY MR. TOKORO: And in fact, based on the

6 communications that Mr. DiBona showed you earlier, I

7 believe it was exhibits -- I'm going back through my

8 notes -- but Exhibits 4 through 8, you were still

9 communicating with Sheriff Villanueva -- well,

10 Mr. Villanueva in March of 2023, to set up interviews in

11 connection with both of those investigations, correct?

12 A Correct.

13 MR. DiBONA: Objection to form.

14 MR. TOKORO: You can answer that again, Miss

15 Diaz-Herrera.

16 THE WITNESS: Yes, that's accurate. I was

17 still trying to set up an interview with former Sheriff

18 Villanueva as late as March 2023.

19 Q BY MR. TOKORO: Correct. So when

20 Mr. Villanueva alleges that the investigations by you

21 were concluded in July of 2022, that is not accurate, is

22 it?

23 MR. DiBONA: Objection. Form. Leading.

24 THE WITNESS: It would not have been possible

25 for my investigations to have been concluded in July of

1 2022.

2 Q BY MR. TOKORO: Okay. Now, Mr. Villanueva has  
3 made two claims in this case, and I want to talk to you  
4 about them separately. Mr. Villanueva has claimed that  
5 Deputy Satterfield -- well, he's actually no longer with  
6 the department, so Mr. Satterfield advised him in July  
7 or August of 2022 that the investigations had been  
8 concluded.

9 Did you ever have a conversation with Deputy  
10 Satterfield where you told him that the investigations  
11 had concluded in July of 2022?

12 MR. DiBONA: Objection. Form. Leading.

13 THE WITNESS: No, I never actually had any  
14 conversation with Mr. Satterfield. He never responded  
15 to my e-mails. There was no communication between --  
16 Mr. Satterfield never communicated anything with me.

17 Q BY MR. TOKORO: In fact, based on your prior  
18 testimony, it sounds like you continued to try to  
19 communicate with Mr. Satterfield to set up this  
20 interview even after July of 2022, is that accurate?

21 MR. DiBONA: Objection to form. Leading.

22 THE WITNESS: Yes.

23 Q BY MR. TOKORO: Okay. And was Mr. Satterfield,  
24 other than you reaching out to him to set up  
25 Mr. Villanueva's interviews, was Mr. Satterfield

1 involved at all in your investigation?

2 A No.

3 Q Were you communicating with him about the  
4 status of the investigation?

5 A No. I have never spoken to Mr. Satterfield.

6 Q Did you ever e-mail or communicate in any way,  
7 shape or form, to Mr. Satterfield that you had concluded  
8 your investigations in July of 2022?

9 A No, the only e-mail that I sent to  
10 Mr. Satterfield was to try to coordinate  
11 Mr. Villanueva's interview.

12 Q Did you communicate to anybody, and I mean  
13 anyone, anybody in July or August of 2022, that you had  
14 completed the investigation into Mr. Huntsman's  
15 complaints?

16 A No.

17 Q Did you communicate to anybody in July or  
18 August of 2022 that you had completed your investigation  
19 into Esther Lim's complaints?

20 A No.

21 Q Have you ever told anyone at any time that you  
22 completed your investigation into Mr. Huntsman's  
23 complaints in July of 2022?

24 A No.

25 Q Did you ever tell anyone at any time that you

1 completed your investigations into Esther Lim's  
2 complaints in July of 2022?

3 A No.

4 Q And you wouldn't have told anyone that because  
5 it isn't accurate, correct?

6 MR. DiBONA: Objection. Leading. Form.

7 THE WITNESS: Correct. It would have been  
8 inaccurate to say my investigation was complete in July  
9 2020 or even August 2020.

10 Q BY MR. TOKORO: Now, the second claim Mr.  
11 Villanueva has made is that he was advised by Ed Alvarez  
12 that you had completed your investigations in July of  
13 2022 after the department determined that there was no  
14 misconduct.

15 Do you know who Ed Alvarez is?

16 MR. DiBONA: Objection to form.

17 THE WITNESS: I don't know who Ed Alvarez is.  
18 I have never spoken with him. I have never e-mailed  
19 with him. Have no communication with Ed Alvarez.

20 Q BY MR. TOKORO: Was Ed -- and I don't want to  
21 assume the answer here, but was Ed Alvarez involved in  
22 any way, shape or form, in your investigation into  
23 Mr. Huntsman?

24 A No. I don't even know who he is.

25 Q Was Ed Alvarez involved in any way, shape or

1 form, into your investigation into Esther Lim's

2 complaints?

3 A No.

4 Q Did you ever speak with Ed Alvarez, whether in  
5 writing or orally, and advise him that you had completed  
6 your investigation in July or August of 2022?

7 A No.

8 Q Did you ever communicate with Ed Alvarez that  
9 you had completed your investigation into Esther Lim's  
10 complaints in July or August of 2022?

11 A No.

12 Q Now, we started this deposition or at least it  
13 was in the morning with Mr. DiBona asking you a number  
14 of questions about your best practices about being an  
15 employment workplace investigator. So I want to follow  
16 up on some of those questions.

17 And I want to talk about the two investigations  
18 separately. So let's start with Esther Lim's  
19 investigation. So all of these questions relate to that  
20 investigation.

21 Do you stand by the investigation that you did?

22 A Yes.

23 Q Did you conduct an independent and thorough  
24 investigation?

25 MR. DiBONA: Objection. Leading. Form.

1 THE WITNESS: Yes, I did conduct an independent  
2 and thorough investigation.

3 Q BY MR. TOKORO: And when you were conducting  
4 that investigation, were you acting as a neutral  
5 investigator?

6 MR. DiBONA: Objection. Leading. Form.

7 THE WITNESS: Yes, I was a neutral investigator  
8 collecting the facts.

9 Q BY MR. TOKORO: An unbiased investigator?

10 MR. DiBONA: Objection. Leading. Form.

11 THE WITNESS: Yes, I was unbiased.

12 Q BY MR. TOKORO: And did you collect all of the  
13 evidence that you think you needed for purposes of your  
14 investigation?

15 MR. DiBONA: Objection. Leading. Form.

16 THE WITNESS: Yes, I believe I collected  
17 everything that I needed, based on the allegations that  
18 were made.

19 Q BY MR. TOKORO: And did you review the evidence  
20 that you collected in connection with Esther Lim -- the  
21 investigation into Esther Lim's complaint?

22 A Yes, I did, such as the Facebook Live, the  
23 videos themselves, as well as, you know, any other  
24 documents that were given to me.

25 Q Now, other than Mr. Villanueva, did you

1 not receive the summaries?

2 A No. I don't believe it was hampered in any  
3 way. I had -- I reviewed the entire Facebook Live  
4 sessions that were referred to, as well as others. So  
5 no, I don't believe that it was hampered.

6 Q Okay. And I now want to talk about the  
7 Huntsman investigation or the investigation you did into  
8 Mr. Huntsman's complaint.

9 Do you stand by that investigation?

10 A Yes.

11 Q Do you believe that you conducted an  
12 independent investigation into Mr. Huntsman's complaint?

13 MR. DiBONA: Objection. Leading. Form.

14 THE WITNESS: Yes.

15 Q BY MR. TOKORO: Do you believe when you  
16 conducted that investigation you were acting as a  
17 neutral investigator?

18 MR. DiBONA: Objection. Leading. Form.

19 THE WITNESS: Yes.

20 MR. TOKORO: Do you believe when you conducted  
21 that investigation, you did it in an unbiased manner?

22 MR. DiBONA: Objection. Leading. Form.

23 THE WITNESS: Yes.

24 Q BY MR. TOKORO: And when you conducted that  
25 investigation, did you collect all of the evidence that



1 you thought was relevant to the investigation?

2 MR. DiBONA: Objection. Leading. Form.

3 THE WITNESS: Yes, I believe I did collect all  
4 the evidence that was relevant.

5 Q BY MR. TOKORO: And did you review all of that  
6 evidence its entirety as part of your investigation?

7 A Yes, I reviewed all of the evidence in its  
8 entirety.

9 Q And did you interview -- other than  
10 Mr. Villanueva, did you interview everyone that you  
11 thought you needed to interview in order to evaluate Mr.  
12 Huntsman's claims?

13 A Yes. Based on Mr. Huntsman's claims that those  
14 statements were made, like for example, the KFI  
15 interview, they were verifiable by going to the  
16 interview themselves and listening to it. So there was  
17 no need for me to interview someone else, because he  
18 said that the statement was made, the KFI was available,  
19 I listened to it in it's entirety, I confirmed that what  
20 Mr. Huntsman was saying was the truth.

21 Q Got it. And like the investigation into  
22 Miss Lim's complaints, you also went -- did you also go  
23 and collect Facebook Live streams in which Mr. Huntsman  
24 had stated Mr. Villanueva had made disparaging  
25 statements against him?

1 A Yes.

2 Q And did you collect and review those in their  
3 entirety?

4 A I did collect them and review them in their  
5 entirety.

6 Q Okay. And you were able through that process  
7 to confirm that the statements which Mr. Huntsman was  
8 complaining about were in fact made by Mr. Villanueva?

9 A Yes.

10 MR. DiBONA: Objection. Form. Leading.

11 THE WITNESS: Yes, the Facebook Live sessions  
12 confirmed Mr. Huntsman's allegations.

13 Q BY MR. TOKORO: Okay. And were you -- did also  
14 collect as part of your evidence collection, some Tweets  
15 that were made by Mr. Villanueva about Mr. Huntsman?

16 A Yes.

17 Q Okay. And did you review those as part of your  
18 investigation?

19 A Yes, I did.

20 Q Now, one of the other complaints that  
21 Mr. Huntsman had made as part of this process was that  
22 Sheriff Villanueva, Mr. Villanueva had accused him of  
23 being a Holocaust denier. Do you recall that?

24 A Yes.

25 Q Was that part of your investigation?

1 A I believe it was something that we looked into,  
2 yes.

3 Q And in fact, did you pull two Los Angeles Times  
4 articles about the statements that Sheriff Villanueva --  
5 Mr. Villanueva had made about Mr. Huntsman being a  
6 Holocaust denier?

7 A Right, yes. Yes, I had pulled the two L.A.  
8 Times articles.

9 Q And those L.A. Times articles, did they also  
10 include a video of the interview of Sheriff Villanueva,  
11 or Mr. Villanueva where he made the statement that Mr.  
12 Huntsman denied the existence of the Holocaust?

13 A Yes.

14 Q I want to just share my screen quickly. I'm  
15 showing you, Miss Diaz-Herrera -- can you see the  
16 document I put on the screen. It's Exhibit No. 9.

17 A Yes.

18 Q And do you see here it's the "Documentary  
19 Evidence"?

20 A Yes.

21 Q Now, Mr. DiBona asked you some questions about  
22 this. I just want to make clear, the evidence listed  
23 below here, A through K, does this reflect the Tweets  
24 and other evidence that you collected as part of your  
25 investigation?

1 MR. DiBONA: Objection. Form.

2 THE WITNESS: Yes.

3 Q BY MR. TOKORO: And these are all the materials  
4 that you reviewed in their entirety in confirming the  
5 statements made by Mr. Villanueva?

6 A Correct.

7 Q So in your opinion, was there any dispute that  
8 Mr. Villanueva had made the statements that Mr. Huntsman  
9 complained about?

10 A No.

11 MR. DiBONA: Objection. Form.

12 THE WITNESS: No.

13 MR. TOKORO: I have no other questions.

14 MR. DiBONA: I just have some followups briefly  
15 on what you said.

16 EXAMINATION

17 BY MR. DiBONA:

18 Q So Ms. Diaz-Herrera, it's fair to say, you  
19 didn't complete your investigation either with respect  
20 to Max Huntsman allegations, isn't that true?

21 A I did not complete the final report, yes,  
22 that's accurate.

23 Q And you left Sanders Roberts before the  
24 investigation was complete, is that fair?

25 A I left before the final report was created.

1

2 STATE OF CALIFORNIA)

) ss.

3 COUNTY OF LOS ANGELES )

4

5

6 I, CHERYL L. MARQUIS, hereby certify:

7 I am a duly qualified Certified Shorthand

8 Reporter in the State of California, holder of

9 Certificate Number CSR 6731 issued by the Court

10 Reporters Board of California, and which is in full

11 force and effect; (Fed. R. Civ. P. 28(a)).

12 I am authorized to administer oaths or

13 affirmations pursuant to California Code of Civil

14 Procedure, Section 2093(b) and prior to being examined,

15 the witness was first duly sworn by me. (Fed. R. Civ.

16 P. 28(a), 30(f)(1)).

17 I am not a relative or employee or attorney or

18 counsel of any of the parties nor am I a relative or

19 financially interested in this action. (Fed. R. Civ. P.

20 28).

21 I am the deposition officer that

22 stenographically recorded the testimony in the foregoing

23 deposition and the foregoing transcript is a true record

24 of the testimony given by the witness. (Fed R. Civ. P.

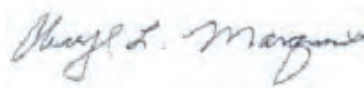
25 30(f)(1)).

1 Before completion of the deposition, review of  
2 the transcript [X] was requested. If requested, any  
3 changes made by the deponent and provided to the  
4 reporter) during the review period allowed, are appended  
5 hereto. (Fed. R. Civ. P. 30(e)).

6

7 Dated: March 20, 2025

8



9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

# EXHIBIT 8

**CERTIFIED COPY**

1605 W. Olympic Blvd., Suite 800 Los Angeles, CA 90015

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

ALEX VILLANUEVA vs COUNTY OF LOS ANGELES

ANN DEVANE

March 06, 2025

Vesna Walter, CSR No. 11989, Job No. 6895



1

2

UNITED STATES DISTRICT COURT

3

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

4

5 ALEX VILLANUEVA, )

6 Plaintiff, )

7 vs. ) Case No.

) 2:24-cv-04979 SVW

8 COUNTY OF LOS ANGELES, COUNTY ) (JCx)  
OF LOS ANGELES SHERIFF'S )

9 DEPARTMENT, LOS ANGELES COUNTY )  
BOARD OF SUPERVISORS, COUNTY )

10 EQUITY OVERSIGHT PANEL, LOS )  
ANGELES COUNTY OFFICE OF )

11 INSPECTOR GENERAL, CONSTANCE )  
KOMOROSKI, MERCEDES CRUZ, )

12 ROBERTA YANG, LAURA LECRIVAIN, )  
SERGIO V. ESCOBEDO, RON )

13 KOPPERUD, ROBERT G. LUNA, )  
MAX-GUSTAF HUNTSMAN, ESTHER )

14 LIM, and DOES 1 to 100, )  
inclusive, )

15 Defendants. )

16 \_\_\_\_\_ )

17

18

19 REMOTE DEPOSITION OF

20 ANN DEVANE

21 Thursday, March 6, 2025

22

23 Stenographically Reported By:  
Vesna Walter, CSR, RPR, CCRR

24 CSR No. 11989  
Job No. 6895

25

1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION  
3  
4 ALEX VILLANUEVA, )  
5 Plaintiff, )  
6 vs. ) Case No.  
7 ) 2:24-cv-04979 SVW  
8 COUNTY OF LOS ANGELES, COUNTY ) (JCx)  
9 OF LOS ANGELES SHERIFF'S )  
10 DEPARTMENT, LOS ANGELES COUNTY )  
11 BOARD OF SUPERVISORS, COUNTY )  
12 EQUITY OVERSIGHT PANEL, LOS )  
13 ANGELES COUNTY OFFICE OF )  
14 INSPECTOR GENERAL, CONSTANCE )  
15 KOMOROSKI, MERCEDES CRUZ, )  
16 ROBERTA YANG, LAURA LECRIVAIN, )  
17 SERGIO V. ESCOBEDO, RON )  
18 KOPPERUD, ROBERT G. LUNA, )  
19 MAX-GUSTAF HUNTSMAN, ESTHER )  
20 LIM, and DOES 1 to 100, )  
21 inclusive, )  
22 Defendants. )  
23 \_\_\_\_\_ )  
24  
25

21 Deposition of ANN DEVANE, taken on behalf of  
22 Plaintiff, with all parties appearing remotely, beginning  
23 at 10:05 a.m. and ending at 3:24 p.m. Pacific time, on  
24 Thursday, March 6, 2025, before VESNA WALTER, Certified  
25 Shorthand Reporter No. 11989.

1 APPEARANCES (All parties appearing remotely)

2

For the Plaintiff:

3

SHEGERIAN & ASSOCIATES, INC.

4

By: ALEX DiBONA

NEIL NABAVI

5

Attorneys at Law

11520 San Vicente Boulevard

6

Los Angeles, California 90049

(310) 860-0770

7

Adibona@shegerianlaw.com

8

For the Defendants:

9

MILLER BARONDESS, LLP

By: JASON H. TOKORO

10

STEVEN WILLIAMSON

Attorneys at Law

11

2121 Avenue of the Stars

Suite 2600

12

Los Angeles, California 90067

(310) 552-4400

13

Jtokoro@millerbarondess.com

14

ALSO PRESENT:

15

ALEX VILLANUEVA

16

17

18

19

20

21

22

23

24

25

1 conduct such investigation?

2 A I don't understand your question.

3 Q It's fair. I'll rephrase it.

4 But do you understand what I mean by "best  
5 practices"?

6 A Not in the respect of investigations.

7 Q All right. Are there specific procedures that  
8 you believe should be followed in every investigation as  
9 an internal affairs investigator with policy of equality?

10 A There are set procedures for the investigators,  
11 but it's not -- it's not, like, a handwritten document.

12 Q And what are those set procedures?

13 A To conduct their investigations, to do fair and  
14 impartial investigations, to document what was said  
15 during the investigations, to transcribe the interviews  
16 and put the casebook together in a specific order once  
17 the investigation is complete.

18 Q Being fair and impartial, would that be another  
19 way of saying it's important the investigators be free of  
20 bias?

21 A Yes.

22 Q And when you say to document, does that mean the  
23 steps of the investigation should be written down or  
24 memorialized?

25 A Yes.

1 employee would make the personnel jacket unavailable, to  
2 your knowledge?

3 A Yes. I believe, when you are no longer an  
4 employee, the personnel jacket is -- it's not accessible  
5 to department employees any longer.

6 Q Is it the same thing for the training record?  
7 Is that generally kept in the personnel jacket?

8 A Yes.

9 Q And by the way, you're using the term "personnel  
10 jacket" colloquially. Would that be the personnel file  
11 or is it something else?

12 A I'm sorry. I'm using jargon. It's a file  
13 folder with all the paperwork during your employment.

14 Q And it says here you stacked the case and  
15 submitted it to IAB Captain Kopperud for review on  
16 September 26, 2023; is that right?

17 A That's correct.

18 Q And is this your handwriting under October 2nd,  
19 2023?

20 A No.

21 Q Do you know whose handwriting it is?

22 A That is Ron Kopperud.

23 Q And are you able to read what it says?

24 A It says "review approved."

25 Q And so Captain Kopperud, he reviewed --

1 according to this investigator log, he reviewed and  
2 approved what you did October 2nd, 2023; is that fair?

3 A That's what's written on the form, yes.

4 Q Have you had a chance -- and I'm happy to put it  
5 back up if you need me to. But having had a chance to  
6 look at this investigator's log, do you believe there are  
7 any steps you took with -- related to the paperwork on  
8 the IAB investigation with respect to Max Huntsman that  
9 for whatever reason are not documented on the  
10 investigator's log?

11 A No. I didn't take any other steps in paperwork.

12 Q I'm sending Exhibit 14 through the chat.

13 MR. TOKORO: Alex, given that you're moving on  
14 to the next topic and it's clear we're not going to  
15 finish in the next 30 to 60 minutes, I think makes sense  
16 to take a lunch break now so we can come back at 1:00.

17 MR. DiBONA: Off the record just for a moment.

18 (Lunch recess.)

19 BY MR. DiBONA:

20 Q Lieutenant Devane, do you understand you're  
21 still under oath?

22 A Yes.

23 Q And is there any reason you can't continue to  
24 give your best testimony?

25 A No.

1 potential violations were?

2 A No. I don't recall anything else.

3 Q And what else -- and excuse me.

4 How did the hearing end?

5 A The panel recommended that they conclude the

6 investigation as founded, and due to the fact that they

7 are not able to give any discipline to, one, Sheriff

8 Villanueva not being an employee, and two being the fact

9 that he was an elected official, that's what they

10 recommended, to put the "do not rehire" on his employee

11 personnel file.

12 Q And by the way, how do they do that? Do they

13 just announce that orally? Is it something in writing?

14 A It's oral. It's done via kind of how -- what

15 we're doing it. We -- the three of us sat in a

16 conference room, and then the CEOP panel members are in

17 remote locations on the screen, and all three of them are

18 on the screen that are visible to us.

19 Q Is that done through Webex?

20 A Yes.

21 Q And after the panel gave their recommendation,

22 what, if anything, occurred after that?

23 A Chief Lecrivain concurred. And I went through

24 the list of charges to determine if they were stating

25 founded or unfounded, and then the hearing concluded.

1 Q Did Chief Lecrivain -- did she explain why she  
2 concurred?

3 A No.

4 Q Did you have any role in concurring?

5 A No.

6 Q Did you ever -- as part of your work with the  
7 IAB investigations, did you ever form the opinion that  
8 Sheriff Alex Villanueva violated the policy of equality  
9 with respect to harassment and discrimination as to Max  
10 Huntsman?

11 MR. TOKORO: I'm just going to make the  
12 objection that her opinion is not relevant and that she  
13 wasn't the decision-maker or involved with any  
14 recommendations.

15 But you can answer give your answer.

16 THE WITNESS: Yeah. I had nothing to do with  
17 the -- anything to do with the violations, if they were  
18 founded or unfounded.

19 BY MR. DiBONA:

20 Q And did you ever form an opinion one way or the  
21 other if Sheriff Alex Villanueva violated the policy of  
22 equality with respect to harassment, discrimination, or  
23 retaliation with respect to Esther Lim?

24 MR. TOKORO: Same objections. Not relevant.

25 But you can answer.



1 internal affairs bureau or any employee in the sheriff's  
2 department.

3 Q I don't have any further questions.

4 Sorry. Before I say that -- excuse me.

5 Lieutenant Devane, as you sit here today, do you believe  
6 any part of your testimony needs to be changed?

7 A No.

8 MR. DiBONA: I don't have any further questions.

9 Do you, Counsel?

10 MR. TOKORO: I do.

11 Are we okay to just continue on, Ms. Walter?

12 (Reporter clarification.)

13 EXAMINATION

14 BY MR. TOKORO:

15 Q Lieutenant Devane, I'd like to follow up on some  
16 of the questions you were being asked earlier. And I do  
17 want to separate the two investigations.

18 So the first investigation I'd like to talk  
19 about is the investigation into complaints made by  
20 Mr. Huntsman. Do you know what I'm referring to?

21 A Yes.

22 Q Okay. Did Sheriff -- from the time that you  
23 took over the investigation as the policy-of-equality  
24 lieutenant for IAB until -- throughout the time that the  
25 CEOP hearing happened, did Sheriff Luna have any

1 involvement with your tasks as part of that  
2 investigation?

3 A No.

4 Q Did you ever have a conversation with Sheriff  
5 Luna about the Huntsman investigation?

6 A No.

7 Q Now, I also want to ask you, did Sheriff Luna  
8 attend the pre-briefing?

9 A No.

10 Q Did Sheriff Luna attend the CEOP briefing on the  
11 Huntsman complaint?

12 A The briefing, no.

13 Q Did Sheriff Luna concur -- well, let me take  
14 that back.

15 You said that Chief Lecrivain is the one who  
16 concurred in the CEOP's recommendations; correct?

17 A That's correct.

18 Q Okay. From the time that you took over the  
19 Huntsman investigation in July of 2023, did the board of  
20 supervisors have any involvement whatsoever in the  
21 investigation?

22 A With me, no.

23 Q Did any member of the board of supervisors  
24 attend the CEOP pre-briefing?

25 A No.

1 Q Did any member of the board of supervisors  
2 attend the CEOP briefing?

3 A Are you -- are you meaning the hearing or the  
4 briefing?

5 Q The hearing.

6 A The hearing, no.

7 Q Did any member of the board of supervisors  
8 direct you in any way on how to conduct the part of the  
9 investigation that you handled?

10 A No.

11 Q Now, you were asked a number of questions about  
12 county counsel and Eduardo Montelongo, and I just want to  
13 make sure the record is clear on this. At any point in  
14 time from when you took over the Huntsman investigation  
15 in July of 2023, did anyone from county counsel  
16 communicate with you about that investigation?

17 A No.

18 Q Did Eduardo Montelongo communicate with you at  
19 all about the investigation?

20 A No.

21 Q The memo that you had looked at, the report from  
22 Sanders Roberts, that was part of the stacked case file  
23 that you put together for the CEOP; correct?

24 A Yes.

25 Q Okay. Now, with respect to the investigation

1 done by Sanders Roberts into Ms. Lim's complaints, did  
2 Sheriff Luna have any involvement in that from the time  
3 that you took over that investigation in July of 2023?

4 A With me, no.

5 Q And again, he didn't attend the CEOP  
6 pre-briefing or hearing; is that right?

7 A No.

8 MR. DiBONA: Objection. Form.

9 BY MR. TOKORO:

10 Q You can answer.

11 A No. He did not -- Sheriff Luna did not attend  
12 the pre-briefing or the hearing.

13 Q Did any member of the board of supervisors have  
14 any involvement in the Lim investigation after you took  
15 it over in July of 2023?

16 A No.

17 Q Did any member of the board of supervisors  
18 attend the CEOP pre-briefing?

19 A No.

20 Q Did any member of the board of supervisors  
21 attend the CEOP hearing?

22 A No.

23 Q Now, I'm going to ask you the same questions as  
24 to county counsel.

25 Did any the member of county counsel have any

1 involvement, to your knowledge, in the Lim investigation  
2 after you took it over in July of 2023?

3 A No.

4 Q Did any member of county counsel attend the  
5 pre-briefing, to your knowledge?

6 A No.

7 Q Did any member of county counsel attend the CEOP  
8 hearing?

9 A No.

10 Q Okay. Now, Mr. Villanueva has claimed in this  
11 case -- it's in his complaint and his amended  
12 complaint -- that the Huntsman and Lim investigations  
13 were concluded in July of 2022 and the department  
14 determined there was no misconduct. I want to separate  
15 the two investigations now.

16 Is it true to say that the Huntsman  
17 investigation concluded in July of 2022?

18 A That's incorrect.

19 Q Is it true to say that the Lim investigation  
20 concluded in July of 2022?

21 A That's incorrect.

22 Q In fact, didn't Sanders Roberts conduct  
23 interviews through August of 2022?

24 MR. DiBONA: Objection. Leading, form.

25 THE WITNESS: Based on the documentation listed

1 on the investigator's log stating how the investigation  
2 was proceeding, it was still proceeding through 2023.  
3 BY MR. TOKORO:  
4 Q In fact, your understanding when you took the  
5 file over -- let's separate that.

6 When you took over the Huntsman investigation in  
7 July of 2023, was it your understanding that that  
8 investigation was still ongoing?

9 A Yes.

10 Q And had been ongoing since the department  
11 started it in June of 2022?

12 A Yes. That's correct.

13 Q Would you say the same for the Lim  
14 investigation, that the Lim investigation, when you took  
15 it over in July of 2023, was still ongoing?

16 A Yes.

17 Q And, in fact, that investigation didn't conclude  
18 until the CEOP heard -- or had its hearing on  
19 October 17th of 2023; is that right?

20 A That's correct.

21 Q And the same goes for the Huntsman  
22 investigation. It did not conclude until the CEOP  
23 meeting in October of 2023; is that right?

24 A Yes.

25 Q So when Mr. Villanueva claims that the

1 investigations both concluded in July of 2022 with no  
2 determination of misconduct, that's not accurate, is it?

3 MR. DiBONA: Objection. Form, leading.

4 THE WITNESS: In July of 2022, the case was  
5 still actively being investigated.

6 BY MR. TOKORO:

7 Q Now, in your involvement -- and I want to  
8 separate these. Your involvement in the Huntsman  
9 investigation, did you ever see anything in the file that  
10 would indicate the department had determined that there  
11 was no misconduct or no policy-of-equality violations by  
12 Mr. Villanueva?

13 A I did not see any documentation that stated  
14 that.

15 Q And in your involvement in the Lim investigation  
16 after you took it over in July of 2023, did you see any  
17 indication at all in the file that the department had  
18 previously determined that there was no policy-of-  
19 equality violations by Mr. Villanueva?

20 A Relating to that case, no, I did not see  
21 anything that stated that.

22 Q Now, Mr. Villanueva was recently deposed in this  
23 case, and he took the position that policy-of-equality  
24 complaints could be decided by the department without  
25 first being presented to the CEOP. Is that true?

1 MR. DiBONA: Objection. Form, leading.

2 THE WITNESS: No. Cases cannot be -- policy-of-  
3 equality violations that turn into an internal affairs  
4 investigation, which is a Level A case, cannot be  
5 concluded unless -- by anyone in the department. It has  
6 to be heard at the CEOP hearings.

7 BY MR. TOKORO:

8 Q Okay. So the Huntsman investigation, was that a  
9 Level A investigation?

10 A Yes.

11 Q The Lim investigation, was that a Level A  
12 investigation?

13 A Yes.

14 Q So the department had determined that the  
15 Huntsman complaint needed to be the subject of an  
16 administrative investigation; is that correct?

17 A That's correct.

18 MR. DiBONA: Objection. Leading.

19 BY MR. TOKORO:

20 Q And that's what Sanders Roberts was retained to  
21 do. Is that your understanding?

22 MR. DiBONA: Objection. Leading.

23 THE WITNESS: I know that Sanders Roberts were  
24 the investigators to do the internal affairs  
25 investigation for a Level A case regarding a policy-



1 of-equality violation.

2 BY MR. TOKORO:

3 Q And so the department had also determined that  
4 the complaint filed with Ms. Lim -- by Ms. Lim also  
5 needed to be subject to an administrative investigation;  
6 is that accurate?

7 A Yes.

8 MR. DiBONA: Objection. Leading.

9 BY MR. TOKORO:

10 Q And so given the fact that the Huntsman  
11 investigation was given a Level A notation, is it your  
12 understanding that the only way that that could get  
13 resolved was when it was presented to the CEOP?

14 A That's correct.

15 Q So do you understand -- could that investigation  
16 have been decided by the department on its own?

17 A No.

18 Q And would the same go for the Lim investigation,  
19 meaning in order to conclude the Lim investigation, did  
20 it need to be presented to the CEOP?

21 MR. DiBONA: You can't hear them either, can  
22 you?

23 MR. TOKORO: No. Our internet got kicked off.

24 It's okay. I will ask the question again and we can -- I  
25 don't know what happened. Both of our cameras turned

1 off.

2 BY MR. TOKORO:

3 Q So speaking with respect to the Lim  
4 investigation, given that it was given a Level A  
5 notation, does that mean it needed to be presented to the  
6 CEOP in order to be determined?

7 A Yes. The investigation to be concluded had to  
8 be presented to the CEOP.

9 Q Could the department decide the complaint on its  
10 own?

11 A No.

12 Q You were asked a question earlier by Mr. DiBona  
13 about whether you were aware of Mr. Villanueva running  
14 for a board seat in 2023. Do you recall that question?

15 A Yes.

16 Q Now, Mr. Villanueva has claimed in this case  
17 that the department -- well, that the placement of the  
18 "do not rehire" notation on his file was in retaliation  
19 for or to hinder his campaign to run for the board, and  
20 so I want to ask you some questions about that.

21 Given that you didn't know he was running for  
22 the board, did any of the steps you undertook have  
23 anything to do with him running for board supervisor?

24 MR. DiBONA: Objection. Leading, form.

25 THE WITNESS: No. I did not know he was running

1 for the board of supervisors, and that had nothing to do  
2 with any of my actions.

3 BY MR. TOKORO:

4 Q Did anyone tell you, "We need to get this case  
5 before the CEOP because Mr. Villanueva is running for the  
6 board"?

7 A No.

8 Q Was it your understanding that anything that had  
9 to do with the "do not rehire" notation had anything to  
10 do with Mr. Villanueva running for the board of  
11 supervisors?

12 A No. I had no information on that.

13 MR. TOKORO: No further questions. Thank you.

14 MR. DiBONA: Just a couple follow-ups.

15 So, Lieutenant Devane, what was Sanders Roberts  
16 retained to do in this case?

17 THE WITNESS: Sanders Roberts were listed as  
18 investigators of this policy-of-equality investigation.

19 MR. DiBONA: And other than that they were  
20 listed, do you know who retained them?

21 THE WITNESS: No.

22 MR. DiBONA: Do you know why they were retained?

23 THE WITNESS: No.

24 MR. DiBONA: No further questions.

25 So unless you have any follow-up on that, I

DEVANE, ANN

Page 193

1 DECLARATION UNDER PENALTY OF PERJURY

2 I, ANN DEVANE, hereby certify under penalty of  
3 perjury under the laws of the State of California that  
4 the foregoing is true and correct.

5

6

7 Executed this 17 day of MARCH, 2025, at

8 INDUSTRY, CALIFORNIA.

9 (City)

(State)

10

11

12

ANN DEVANE

13

14

15

16

17

18

19

20

21

22

23

24

25

1 I, the undersigned, a Certified Shorthand  
2 Reporter of the State of California, do hereby certify:

3 That the foregoing proceedings were taken before  
4 me at the time and date herein set forth; that any  
5 witnesses in the foregoing proceedings, prior to  
6 testifying, were duly sworn; that a record of the  
7 proceedings was made by me using machine shorthand, which  
8 was thereafter transcribed under my direction; that the  
9 foregoing transcript is a true record of the testimony  
10 given.

11 Further, that if the foregoing pertains to the  
12 original transcript of a deposition in a federal case,  
13 before completion of the proceedings, review of the  
14 transcript [XX] was [ ] was not requested.

15  
16 I further certify I am neither financially  
17 interested in the action nor a relative or employee of  
18 any attorney or party to this action.

19 IN WITNESS WHEREOF, I have this date subscribed  
20 my name.

21

22 Dated: March 17, 2025

23



24

Vesna Walter  
RPR, CCRR, CSR No. 11989

25

# EXHIBIT 9

CERTIFIED COPY



1605 W. Olympic Blvd., Suite 800 Los Angeles, CA 90015

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ALEX VILLANUEVA vs COUNTY OF LOS ANGELES

MAX HUNTSMAN

March 07, 2025

John Fahrenwald, CSR No. 14369, RPR, Job No. 6383

1 UNITED STATES DISTRICT COURT

2 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

3

4 ALEX VILLANUEVA, )  
5 Plaintiff, ) Case No.: 2:24-cv-04979 SVW (JCx)  
6 vs. )  
7 COUNTY OF LOS ANGELES, )  
8 COUNTY OF LOS ANGELES )  
9 SHERIFF'S DEPARTMENT, LOS )  
10 ANGELES COUNTY BOARD OF )  
11 SUPERVISORS, COUNTY EQUITY )  
12 OVERSIGHT PANEL, LOS )  
13 ANGELES COUNTY OFFICE OF )  
14 INSPECTOR GENERAL, )  
15 CONSTANCE KOMOROSKI, )  
16 MERCEDES CRUZ, ROBERTA )  
17 YANG, LAURA LECRIVAIN, )  
18 SERGIO V. ESCOBEDO, RON )  
19 KOPPERUD, ROBERT G. LUNA, )  
20 MAX-GUSTAF HUNTSMAN, )  
21 ESTHER LIM, and DOES 1 to )  
22 100, inclusive, )  
23 ) (Pages 1-192)  
24 Defendants. )  
25 \_\_\_\_\_)

17

18 VIDEOCONFERENCE DEPOSITION OF

19 MAX HUNTSMAN

20 Friday, March 7th, 2025

21 10:02 a.m. PT

22

23

24 Reported by: John Fahrenwald, CA CSR 14369, RPR

25 \_\_\_\_\_



HUNTSMAN, MAX

Page 2

1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION  
3  
4 ALEX VILLANUEVA, )  
5 Plaintiff, ) Case No.: 2:24-cv-04979 SVW (JCx)  
6 vs. )  
7 COUNTY OF LOS ANGELES, )  
8 COUNTY OF LOS ANGELES )  
9 SHERIFF'S DEPARTMENT, LOS )  
10 ANGELES COUNTY BOARD OF )  
11 SUPERVISORS, COUNTY EQUITY )  
12 OVERSIGHT PANEL, LOS )  
13 ANGELES COUNTY OFFICE OF )  
14 INSPECTOR GENERAL, )  
15 CONSTANCE KOMOROSKI, )  
16 MERCEDES CRUZ, ROBERTA )  
17 YANG, LAURA LECRIVAIN, )  
18 SERGIO V. ESCOBEDO, RON )  
19 KOPPERUD, ROBERT G. LUNA, )  
20 MAX-GUSTAF HUNTSMAN, )  
21 ESTHER LIM, and DOES 1 to )  
22 100, inclusive, )  
23 Defendants. )  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45  
46  
47  
48  
49  
50  
51  
52  
53  
54  
55  
56  
57  
58  
59  
60  
61  
62  
63  
64  
65  
66  
67  
68  
69  
70  
71  
72  
73  
74  
75  
76  
77  
78  
79  
80  
81  
82  
83  
84  
85  
86  
87  
88  
89  
90  
91  
92  
93  
94  
95  
96  
97  
98  
99  
100  
101  
102  
103  
104  
105  
106  
107  
108  
109  
110  
111  
112  
113  
114  
115  
116  
117  
118  
119  
120  
121  
122  
123  
124  
125  
126  
127  
128  
129  
130  
131  
132  
133  
134  
135  
136  
137  
138  
139  
140  
141  
142  
143  
144  
145  
146  
147  
148  
149  
150  
151  
152  
153  
154  
155  
156  
157  
158  
159  
160  
161  
162  
163  
164  
165  
166  
167  
168  
169  
170  
171  
172  
173  
174  
175  
176  
177  
178  
179  
180  
181  
182  
183  
184  
185  
186  
187  
188  
189  
190  
191  
192  
193  
194  
195  
196  
197  
198  
199  
200  
201  
202  
203  
204  
205  
206  
207  
208  
209  
210  
211  
212  
213  
214  
215  
216  
217  
218  
219  
220  
221  
222  
223  
224  
225  
226  
227  
228  
229  
230  
231  
232  
233  
234  
235  
236  
237  
238  
239  
240  
241  
242  
243  
244  
245  
246  
247  
248  
249  
250  
251  
252  
253  
254  
255  
256  
257  
258  
259  
260  
261  
262  
263  
264  
265  
266  
267  
268  
269  
270  
271  
272  
273  
274  
275  
276  
277  
278  
279  
280  
281  
282  
283  
284  
285  
286  
287  
288  
289  
290  
291  
292  
293  
294  
295  
296  
297  
298  
299  
300  
301  
302  
303  
304  
305  
306  
307  
308  
309  
310  
311  
312  
313  
314  
315  
316  
317  
318  
319  
320  
321  
322  
323  
324  
325  
326  
327  
328  
329  
330  
331  
332  
333  
334  
335  
336  
337  
338  
339  
340  
341  
342  
343  
344  
345  
346  
347  
348  
349  
350  
351  
352  
353  
354  
355  
356  
357  
358  
359  
360  
361  
362  
363  
364  
365  
366  
367  
368  
369  
370  
371  
372  
373  
374  
375  
376  
377  
378  
379  
380  
381  
382  
383  
384  
385  
386  
387  
388  
389  
390  
391  
392  
393  
394  
395  
396  
397  
398  
399  
400  
401  
402  
403  
404  
405  
406  
407  
408  
409  
410  
411  
412  
413  
414  
415  
416  
417  
418  
419  
420  
421  
422  
423  
424  
425  
426  
427  
428  
429  
430  
431  
432  
433  
434  
435  
436  
437  
438  
439  
440  
441  
442  
443  
444  
445  
446  
447  
448  
449  
450  
451  
452  
453  
454  
455  
456  
457  
458  
459  
460  
461  
462  
463  
464  
465  
466  
467  
468  
469  
470  
471  
472  
473  
474  
475  
476  
477  
478  
479  
480  
481  
482  
483  
484  
485  
486  
487  
488  
489  
490  
491  
492  
493  
494  
495  
496  
497  
498  
499  
500  
501  
502  
503  
504  
505  
506  
507  
508  
509  
510  
511  
512  
513  
514  
515  
516  
517  
518  
519  
520  
521  
522  
523  
524  
525  
526  
527  
528  
529  
530  
531  
532  
533  
534  
535  
536  
537  
538  
539  
540  
541  
542  
543  
544  
545  
546  
547  
548  
549  
550  
551  
552  
553  
554  
555  
556  
557  
558  
559  
560  
561  
562  
563  
564  
565  
566  
567  
568  
569  
570  
571  
572  
573  
574  
575  
576  
577  
578  
579  
580  
581  
582  
583  
584  
585  
586  
587  
588  
589  
590  
591  
592  
593  
594  
595  
596  
597  
598  
599  
600  
601  
602  
603  
604  
605  
606  
607  
608  
609  
610  
611  
612  
613  
614  
615  
616  
617  
618  
619  
620  
621  
622  
623  
624  
625  
626  
627  
628  
629  
630  
631  
632  
633  
634  
635  
636  
637  
638  
639  
640  
641  
642  
643  
644  
645  
646  
647  
648  
649  
650  
651  
652  
653  
654  
655  
656  
657  
658  
659  
660  
661  
662  
663  
664  
665  
666  
667  
668  
669  
670  
671  
672  
673  
674  
675  
676  
677  
678  
679  
680  
681  
682  
683  
684  
685  
686  
687  
688  
689  
690  
691  
692  
693  
694  
695  
696  
697  
698  
699  
700  
701  
702  
703  
704  
705  
706  
707  
708  
709  
710  
711  
712  
713  
714  
715  
716  
717  
718  
719  
720  
721  
722  
723  
724  
725  
726  
727  
728  
729  
730  
731  
732  
733  
734  
735  
736  
737  
738  
739  
740  
741  
742  
743  
744  
745  
746  
747  
748  
749  
750  
751  
752  
753  
754  
755  
756  
757  
758  
759  
760  
761  
762  
763  
764  
765  
766  
767  
768  
769  
770  
771  
772  
773  
774  
775  
776  
777  
778  
779  
780  
781  
782  
783  
784  
785  
786  
787  
788  
789  
790  
791  
792  
793  
794  
795  
796  
797  
798  
799  
800  
801  
802  
803  
804  
805  
806  
807  
808  
809  
810  
811  
812  
813  
814  
815  
816  
817  
818  
819  
820  
821  
822  
823  
824  
825  
826  
827  
828  
829  
830  
831  
832  
833  
834  
835  
836  
837  
838  
839  
840  
841  
842  
843  
844  
845  
846  
847  
848  
849  
850  
851  
852  
853  
854  
855  
856  
857  
858  
859  
860  
861  
862  
863  
864  
865  
866  
867  
868  
869  
870  
871  
872  
873  
874  
875  
876  
877  
878  
879  
880  
881  
882  
883  
884  
885  
886  
887  
888  
889  
890  
891  
892  
893  
894  
895  
896  
897  
898  
899  
900  
901  
902  
903  
904  
905  
906  
907  
908  
909  
910  
911  
912  
913  
914  
915  
916  
917  
918  
919  
920  
921  
922  
923  
924  
925  
926  
927  
928  
929  
930  
931  
932  
933  
934  
935  
936  
937  
938  
939  
940  
941  
942  
943  
944  
945  
946  
947  
948  
949  
950  
951  
952  
953  
954  
955  
956  
957  
958  
959  
960  
961  
962  
963  
964  
965  
966  
967  
968  
969  
970  
971  
972  
973  
974  
975  
976  
977  
978  
979  
980  
981  
982  
983  
984  
985  
986  
987  
988  
989  
990  
991  
992  
993  
994  
995  
996  
997  
998  
999  
1000  
1001  
1002  
1003  
1004  
1005  
1006  
1007  
1008  
1009  
1010  
1011  
1012  
1013  
1014  
1015  
1016  
1017  
1018  
1019  
1020  
1021  
1022  
1023  
1024  
1025  
1026  
1027  
1028  
1029  
1030  
1031  
1032  
1033  
1034  
1035  
1036  
1037  
1038  
1039  
1040  
1041  
1042  
1043  
1044  
1045  
1046  
1047  
1048  
1049  
1050  
1051  
1052  
1053  
1054  
1055  
1056  
1057  
1058  
1059  
1060  
1061  
1062  
1063  
1064  
1065  
1066  
1067  
1068  
1069  
1070  
1071  
1072  
1073  
1074  
1075  
1076  
1077  
1078  
1079  
1080  
1081  
1082  
1083  
1084  
1085  
1086  
1087  
1088  
1089  
1090  
1091  
1092  
1093  
1094  
1095  
1096  
1097  
1098  
1099  
1100  
1101  
1102  
1103  
1104  
1105  
1106  
1107  
1108  
1109  
1110  
1111  
1112  
1113  
1114  
1115  
1116  
1117  
1118  
1119  
1120  
1121  
1122  
1123  
1124  
1125  
1126  
1127  
1128  
1129  
1130  
1131  
1132  
1133  
1134  
1135  
1136  
1137  
1138  
1139  
1140  
1141  
1142  
1143  
1144  
1145  
1146  
1147  
1148  
1149  
1150  
1151  
1152  
1153  
1154  
1155  
1156  
1157  
1158  
1159  
1160  
1161  
1162  
1163  
1164  
1165  
1166  
1167  
1168  
1169  
1170  
1171  
1172  
1173  
1174  
1175  
1176  
1177  
1178  
1179  
1180  
1181  
1182  
1183  
1184  
1185  
1186  
1187  
1188  
1189  
1190  
1191  
1192  
1193  
1194  
1195  
1196  
1197  
1198  
1199  
1200  
1201  
1202  
1203  
1204  
1205  
1206  
1207  
1208  
1209  
1210  
1211  
1212  
1213  
1214  
1215  
1216  
1217  
1218  
1219  
1220  
1221  
1222  
1223  
1224  
1225  
1226  
1227  
1228  
1229  
1230  
1231  
1232  
1233  
1234  
1235  
1236  
1237  
1238  
1239  
1240  
1241  
1242  
1243  
1244  
1245  
1246  
1247  
1248  
1249  
1250  
1251  
1252  
1253  
1254  
1255  
1256  
1257  
1258  
1259  
1260  
1261  
1262  
1263  
1264  
1265  
1266  
1267  
1268  
1269  
1270  
1271  
1272  
1273  
1274  
1275  
1276  
1277  
1278  
1279  
1280  
1281  
1282  
1283  
1284  
1285  
1286  
1287  
1288  
1289  
1290  
1291  
1292  
1293  
1294  
1295  
1296  
1297  
1298  
1299  
1300  
1301  
1302  
1303  
1304  
1305  
1306  
1307  
1308  
1309  
1310  
1311  
1312  
1313  
1314  
1315  
1316  
1317  
1318  
1319  
1320  
1321  
1322  
1323  
1324  
1325  
1326  
1327  
1328  
1329  
1330  
1331  
1332  
1333  
1334  
1335  
1336  
1337  
1338  
1339  
1340  
1341  
1342  
1343  
1344  
1345  
1346  
1347  
1348  
1349  
1350  
1351  
1352  
1353  
1354  
1355  
1356  
1357  
1358  
1359  
1360  
1361  
1362  
1363  
1364  
1365  
1366  
1367  
1368  
1369  
1370  
1371  
1372  
1373  
1374  
1375  
1376  
1377  
1378  
1379  
1380  
1381  
1382  
1383  
1384  
1385  
1386  
1387  
1388  
1389  
1390  
1391  
1392  
1393  
1394  
1395  
1396  
1397  
1398  
1399  
1400  
1401  
1402  
1403  
1404  
1405  
1406  
1407  
1408  
1409  
1410  
1411  
1412  
1413  
1414  
1415  
1416  
1417  
1418  
1419  
1420  
1421  
1422  
1423  
1424  
1425  
1426  
1427  
1428  
1429  
1430  
1431  
1432  
1433  
1434  
1435  
1436  
1437  
1438  
1439  
1440  
1441  
1442  
1443  
1444  
1445  
1446  
1447  
1448  
1449  
1450  
1451  
1452  
1453  
1454  
1455  
1456  
1457  
1458  
1459  
1460  
1461  
1462  
1463  
1464  
1465  
1466  
1467  
1468  
1469  
1470  
1471  
1472  
1473  
1474  
1475  
1476  
1477  
1478  
1479  
1480  
1481  
1482  
1483  
1484  
1485  
1486  
1487  
1488  
1489  
1490  
1491  
1492  
1493  
1494  
1495  
1496  
1497  
1498  
1499  
1500  
1501  
1502  
1503  
1504  
1505  
1506  
1507  
1508  
1509  
1510  
1511  
1512  
1513  
1514  
1515  
1516  
1517  
1518  
1519  
1520  
1521  
1522  
1523  
1524  
1525  
1526  
1527  
1528  
1529  
1530  
1531  
1532  
1533  
1534  
1535  
1536  
1537  
1538  
1539  
1540  
1541  
1542  
1543  
1544  
1545  
1546  
1547  
1548  
1549  
1550  
1551  
1552  
1553  
1554  
1555  
1556  
1557  
1558  
1559  
1560  
1561  
1562  
1563  
1564  
1565  
1566  
1567  
1568  
1569  
1570  
1571  
1572  
1573  
1574  
1575  
1576  
1577  
1578  
1579  
1580  
1581  
1582  
1583  
1584  
1585  
1586  
1587  
1588  
1589  
1590  
1591  
1592  
1593  
1594  
1595  
1596  
1597  
1598  
1599  
1600  
1601  
1602  
1603  
1604  
1605  
1606  
1607  
1608  
1609  
1610  
1611  
1612  
1613  
1614  
1615  
1616  
1617  
1618  
1619  
1620  
1621  
1622  
1623  
1624  
1625  
1626  
1627  
1628  
1629  
1630  
1631  
1632  
1633  
1634  
1635  
1636  
1637  
1638  
1639  
1640  
1641  
1642  
1643  
1644  
1645  
1646  
1647  
1648  
1649  
1650  
1651  
1652  
1653  
1654  
1655  
1656  
1657  
1658  
1659  
1660  
1661  
1662  
1663  
1664  
1665  
1666  
1667  
1668  
1669  
1670  
1671  
1672  
1673  
1674  
1675  
1676  
1677  
1678  
1679  
1680  
1681  
1682  
1683  
1684  
1685  
1686  
1687  
1688  
1689  
1690  
1691  
1692  
1693  
1694  
1695  
1696  
1697  
1698  
1699  
1700  
1701  
1702  
1703  
1704  
1705  
1706  
1707  
1708  
1709  
1710  
1711  
1712  
1713  
1714  
1715  
1716  
1717  
1718  
1719  
1720  
1721  
1722  
1723  
1724  
1725  
1726  
1727  
1728  
1729  
1730  
1731  
1732  
1733  
1734  
1735  
1736  
1737  
1738  
1739  
1740  
1741  
1742  
1743  
1744  
1745  
1746  
1747  
1748  
1749  
1750  
1751  
1752  
1753  
1754  
1755  
1756  
1757  
1758  
1759  
1760  
1761  
1762  
1763  
1764  
1765  
1766  
1767  
1768  
1769  
1770  
1771  
1772  
1773  
1774  
1775  
1776  
1777  
1778  
1779  
1780  
1781  
1782  
1783  
1784  
1785  
1786  
1787  
1788  
1789  
1790  
1791  
1792  
1793  
1794  
1795  
1796  
1797  
1798  
1799  
1800  
1801  
1802  
1803  
1804  
1805  
1806  
1807  
1808  
1809  
1810  
1811  
1812  
1813  
1814  
1815  
1816  
1817  
1818  
1819  
1820  
1821  
1822  
1823  
1824  
1825  
1826  
1827  
1828  
1829  
1830  
1831  
1832  
1833  
1834  
1835  
1836  
1837  
1838  
1839  
1840  
1841  
1842  
1843  
1844  
1845  
1846  
1847  
1848  
1849  
1850  
1851  
1852  
1853  
1854  
1855  
1856  
1857  
1858  
1859  
1860  
1861  
1862  
1863  
1864  
1865  
1866  
1867  
1868  
1869  
1870  
1871  
1872  
1873  
1874  
1875  
1876  
1877  
1878  
1879  
1880  
1881  
1882  
1883  
1884  
1885  
1886  
1887  
1888  
1889  
1890  
1891  
1892  
1893  
1894  
1895  
1896  
1897  
1898  
1899  
1900  
1901  
1902  
1903  
1904  
1905  
1906  
1907  
1908  
1909  
1910  
1911  
1912  
1913  
1914  
1915  
1916  
1917  
1918  
1919  
1920  
1921  
1922  
1923  
1924  
1925  
1926  
1927  
1928  
1929  
1930  
1931  
1932  
1933  
1934  
1935  
1936  
1937  
1938  
1939  
1940  
1941  
1942  
1943  
1944  
1945  
1946  
1947  
1948  
1949  
1950  
1951  
1952  
1953  
1954  
1955  
1956  
1957  
1958  
1959  
1960  
1961  
1962  
1963  
1964  
1965  
1966  
1967  
1968  
1969  
1970  
1971  
1972  
1973  
1974  
1975  
1976  
1977  
1978  
1979  
1980  
1981  
1982  
1983  
1984  
1985  
1986  
1987  
1988  
1989  
1990  
1991  
1992  
1993  
1994  
1995  
1996  
1997  
1998  
1999  
2000  
2001  
2002  
2003  
2004  
2005  
2006  
2007  
2008  
2009  
2010  
2011  
2012  
2013  
2014  
2015  
2016  
2017  
2018  
2019  
2020  
2021  
2022  
2023  
2024  
2025  
2026  
2027  
2028  
2029  
2030  
2031  
2032  
2033  
2034  
2035  
2036  
2037  
2038  
2039  
2040  
2041  
2042  
2043  
2044  
2045  
2046  
2047  
2048  
2049  
2050  
2051  
2052  
2053  
2054  
2055  
2056  
2057  
2058  
2059  
2060  
2061  
2062  
2063  
2064  
2065  
2066  
2067  
2068  
2069  
2070  
2071  
2072  
2073  
2074  
2075  
2076  
2077  
2078  
2079  
2080  
2081  
2082  
2083  
2084  
2085  
2086  
2087  
2088  
2089  
2090  
2091  
2092  
2093  
2094  
2095  
2096  
2097  
2098  
2099  
2100  
2101  
2102  
2103  
2104  
2105  
2106  
2107  
2108  
2109  
2110  
2111  
2112  
2113  
2114  
2115  
2116  
2117  
2118  
2119  
2120  
2121  
2122  
2123  
2124  
2125  
2126  
2127  
2128  
2129  
2130  
2131  
2132  
2133  
2134  
2135  
2136  
2137  
2138  
2139  
2140  
2141  
2142  
2143  
2144  
2145  
2146  
2147  
2148  
2149  
2150  
2151  
2152  
2153  
2154  
2155  
2156  
2157  
2158  
2159  
2160  
2161  
2162  
2163  
2164  
2165  
2166  
2167  
2168  
2169  
2170  
2171  
2172  
2173  
2174  
2175  
2176  
2177  
2178  
2179  
2180  
2181

HUNTSMAN, MAX

Page 3

1 APPEARANCES:

2

FOR THE PLAINTIFF:

3

BY: ALEX DIBONA, ESQ.  
SHEGERIAN & ASSOCIATES, INC.  
11520 San Vicente Boulevard  
Los Angeles, California 90049  
Telephone Number: (310) 860 0770  
Facsimile Number: (310) 860 0771  
ADiBona@shegerianlaw.com

7

8

FOR THE DEFENDANT:

9

BY: JASON H. TOKORO, ESQ.  
STEVEN G. WILLIAMSON, ESQ.  
MILLER BARONDESS, LLP  
2121 Avenue of the Stars, Suite 2600  
Los Angeles, California 90067  
jtokoro@millerbarondess.com

10

11

12

13

14

15 Also Present: Mr. Villanueva

16

17

18

19

20

21

22

23

24

25

HUNTSMAN, MAX

Page 47

1 Q. (BY MR. DIBONA:) Other than your belief that the  
2 criminal investigation was announced to follow through on  
3 the threat, do you believe Sheriff Villanueva followed up on  
4 that threat in any other way?

5 A. Oh, yes, repeatedly for years.

6 Q. How do you believe he followed up?

7 A. Well, I can't -- sitting here, I cannot remember  
8 all the things that he did in the time that he was sheriff.  
9 But he constantly threatened publicly to release information  
10 about me both in terms of the criminal investigation that he  
11 was then going to present to the authorities to get me  
12 prosecuted -- so that was an ongoing threat very  
13 specifically to me in order to suppress my discharge of my  
14 duties -- and he would then also publicly make comments  
15 about it, which I took as an ongoing threat myself.

16 He expanded it out to other people, including  
17 Diana Teran, Sheila Kuehl; Patti Giggans, who was the chair  
18 of the Civilian Oversight Commission; Mary Wickham, Sachi  
19 Hamai. He accused her of conflict of interest when one of  
20 the elements of the crime was completely missing and  
21 submitted that to the attorney general's office for  
22 prosecution as well.

23 So there was a whole series of conduct that was --  
24 had the effect of chilling oversight during his time as  
25 sheriff. And then ultimately there is the subject matter of

HUNTSMAN, MAX

Page 48

1 this lawsuit when he started to use a name that I don't use  
2 anymore for reasons that were not altogether clear at first  
3 but later became clear when he accused me of being a  
4 Holocaust denier as well as publicly disclosing my CPOE  
5 report against him.

6 That was sort of the main aspect of it. There's a  
7 lot of details to all that stuff that happened over the many  
8 years that I, one, can't remember sitting here. You'd have  
9 to dig up documents if you wanted to have a detailed  
10 understanding of it. And, two, I'm not aware of all of it  
11 because a lot of other parties were involved. But that was  
12 sort of the arc of it.

13 Q. And is it fair to say that you believe, as a  
14 general matter, Sheriff Villanueva attempted to obstruct  
15 oversight of your office?

16 A. Yes. And he committed extortion.

17 Q. And is it your testimony that the legal -- that --  
18 excuse me. Is it -- strike that.

19 Do you, by the way, believe that legally it's  
20 completely clear what you have authority to access as a  
21 inspector general?

22 A. Well, that's a complicated question. Do I believe  
23 it? Yes, I believe the law is clear. And there are words  
24 in the law that, you read them, and they say what they mean  
25 and it's very clear.

HUNTSMAN, MAX

Page 133

1 MR. TOKORO: Absolutely.

2 (A break was taken from 1:04 p.m. to 1:41 p.m.)

3 Q. (BY MR. DIBONA:) Mr. Huntsman, do you understand  
4 you're still under oath?

5 A. Yes.

6 Q. Is there any reason you can't continue to give  
7 your best testimony?

8 A. No.

9 Q. At some point in time, did you become aware that  
10 Sheriff Alex Villanueva was referring to you as Max-Gustaf?

11 A. Yes.

12 Q. How did you become aware of that?

13 A. I don't recall.

14 Q. And do you recall all the forums in which he  
15 referred to you as Max-Gustaf?

16 A. No.

17 Q. And did you decide to file a complaint with anyone  
18 at the County relating to him calling you Max-Gustaf?

19 A. I was required by County rules to do so.

20 Q. And I might know this, but why do you believe you  
21 were required by County rules to do so?

22 A. County's policy of equity requires supervisors to  
23 report incidents of discrimination. And so in this case, as  
24 a supervisor, I had to do it.

25 Q. And who did you make the complaint to?

HUNTSMAN, MAX

Page 134

1 A. I don't recall, but I assume I sent an email to  
2 Vickey Bane or her office.

3 Q. And who is Vickey Bane, to your understanding?

4 A. She runs the CPOE intake unit.

5 Q. Do you still have a copy of that email?

6 A. I don't, but the County email server might. I  
7 assume it's in the investigative record.

8 Q. Why did you believe it was an act of  
9 discrimination for him to refer to you as Max-Gustaf?

10 A. Because I didn't use that name. He'd never used  
11 that name to refer to me. And suddenly he started focusing  
12 on it and using it repeatedly, even after it was pointed out  
13 to him that it wasn't my name. And he stuck with it.

14 So it was pretty clear, based on his prior  
15 behavior in which he had threatened me and had attempted to  
16 convince everybody I was a criminal, that he was in some way  
17 continuing to target me. And since he was using a name that  
18 is German, that's national origin based. So that's why I  
19 had to report it.

20 Q. And who do you believe pointed out to him --  
21 sorry.

22 Did you ever point out to Sheriff Villanueva that  
23 that's not your name?

24 A. I don't know that I did or I didn't. I don't  
25 recall.

HUNTSMAN, MAX

Page 140

1 year you sent that email?

2 A. No.

3 Q. And was Sheriff Villanueva -- he was still the  
4 sheriff at the time you sent the email. Correct?

5 A. Yes. Because he told the LA Times about the  
6 complaint, which was confidential, and then accused me of  
7 being a Holocaust denier and made some statements about that  
8 to the LA Times board seeking their endorsement for  
9 re-election, I assume that it was some time in the months  
10 running up to the election.

11 Q. And that would have been the second time Sheriff  
12 Villanueva ran for office, in 2022; is that right?

13 A. Re-election. But I don't remember the year. 2022  
14 sounds right, but I'd have to do the math in my head, and  
15 all you'd know is whether or not the math in my head is  
16 doing well or not.

17 Q. And do you recall who from the sheriff's office  
18 called you?

19 A. Not as I sit here, no. I provided the emails.

20 Q. Did you take any notes during that call with that  
21 person from the sheriff's department?

22 A. I don't think so.

23 Q. And what do you recall that person asking you, if  
24 anything?

25 A. Just asking about what happened, asking, you know,

HUNTSMAN, MAX

Page 142

1 know.

2 Q. Prior to you sending Ms. Bane the email that was a  
3 complaint about Sheriff Villanueva, did you discuss the fact  
4 you were going to file that complaint with anyone?

5 A. I don't know -- I don't remember necessarily  
6 discussing that I was going to file the complaint with  
7 anyone. I certainly discussed what Villanueva was doing  
8 with my colleagues, but I don't remember if I said, And I'm  
9 going to file a complaint.

10 I might have. I mean, I'm a manager and I have  
11 fellow managers that work with me and have an obligation, so  
12 I might have told the other managers I'm going to file this  
13 so they wouldn't have to. I don't know. I don't remember.

14 Q. Do you remember telling anyone at county counsel,  
15 I'm going to file this complaint?

16 A. I don't recall that.

17 Q. Do you recall telling any member of the Board of  
18 Supervisors, I'm going to file this complaint?

19 A. I don't recall that, and that seems unlikely.

20 Q. Do you recall telling any member of the Board of  
21 Supervisors' staff you were going to file the complaint?

22 A. I had some conversations with Esther Lim, who was  
23 also being targeted by Villanueva, and so we consoled each  
24 other a bit. It's possible in those exchanges that I might  
25 have said I'm going to file a complaint about it. I don't



HUNTSMAN, MAX

Page 155

1 difficulty with that, you can let me know. It will just  
2 take a second. I'm sorry for the delay.

3 All right. I've sent it through the chat, and  
4 I'll try to share my screen.

5 Do you see a document on your screen, sir?

6 A. I do.

7 Q. For the record, that's COLA001976, and it goes to  
8 2012.

9 Have you ever seen this document before, sir?

10 A. I don't know. It has my name on it, and it has  
11 the name Herrera, so it might be a transcript of questions  
12 asked by the second investigator we were talking about.

13 Q. One moment. Do you recall -- I'm just going to  
14 take it off screen for a second.

15 Do you -- even if you haven't seen this  
16 transcript, you recall speaking to her; is that right?

17 A. Yes. And I'm not saying I haven't seen the  
18 transcript. I don't recall.

19 Q. And to the best of your recollection, is what you  
20 said to Christine Diaz-Herrera accurate?

21 A. In that transcript that I saw for two seconds? I  
22 have no idea.

23 Q. No, no. Just to be clear --

24 A. Oh. When I was speaking to her, was I trying to  
25 tell the truth? Yes, yes.

HUNTSMAN, MAX

Page 156

1 Q. Yes, that was it.

2 A. I thought you were talking about the transcript.

3 Q. I understand you didn't prepare the transcript, so  
4 that was just my question. When you were speaking to her,  
5 you were trying to tell the truth; is that fair?

6 A. I was trying to tell the truth.

7 Q. And as you sit here today, you don't believe that  
8 anything you said to her was not the truth; is that fair?

9 A. I have no idea. It certainly wouldn't have been  
10 intentionally not the truth. But whether or not I got  
11 something wrong, it was a long time ago, and I don't  
12 remember.

13 Q. Do you see here -- do you see on your screen I  
14 have COLA002000? ^on 002079 of Ex. 1, the investigative  
15 report, I found what he's quoting, but 002000 is not part of  
16 Ex. 1; I assume he misspoke as to the page number^ Do you  
17 see what I have here on the screen?

18 A. I do. It's a little small for me, so if you could  
19 zoom in a tiny bit, I'd sure appreciate it.

20 Oh, wonderful. I see it.

21 Q. All right. Do you see -- just for the record  
22 here, I have a part of the transcript that reads, "It might  
23 be if he had presented me as an Aryan, but he didn't, you  
24 know. So that's why, when he first did it, my take on it  
25 was he was trying to imply I was Jewish, and that would be

HUNTSMAN, MAX

Page 157

1 what I was -- that's what I thought he was doing. I may not  
2 have been correct about that, but that's just how I took it.  
3 And so that's the way I took it. What I think was really  
4 going on -- I mean, again, it's, being a foreigner, I think  
5 is the main thing. So you're right, if white supremacists  
6 really cared about, you know, true Nazism, then none of them  
7 would qualify because most of us here in America are not the  
8 Aryans that the Third Reich was obsessed with. But that's  
9 not how we look at the world."

10 Do you see that on the screen?

11 A. Yes.

12 Q. Do you recall saying that during your interview  
13 with Ms. Diaz-Herrera?

14 A. I recall discussing the subject, and that looks  
15 consistent with what I would have said. But I don't  
16 specifically recall.

17 Q. I'm going to find another portion.

18 While I'm doing that, sir, just to go back to  
19 something, you said at some point in time you came to  
20 believe that Sheriff Villanueva -- he painted you as a  
21 Holocaust denier. He made those statements. Correct?

22 A. He did, yes.

23 Q. And you also said, correct me if I'm wrong, he  
24 took actions that led you to believe that he was catering to  
25 supporters that might be anti-Semitic?

HUNTSMAN, MAX

Page 187

1 your testimony needs to be changed for whatever reason?

2 A. No.

3 MR. DIBONA: I don't have any further questions.

4 Do you, Counsel?

5 MR. TOKORO: I do.

6 I just have a handful of questions for you,  
7 Mr. Huntsman.

8 EXAMINATION

9 BY MR. TOKORO:

10 Q. You were asked about a number of ballot measures,  
11 the County's vaccine mandate, and Fulgent, so I want to  
12 follow up on that.

13 Mr. Villanueva has claimed in this case that the  
14 investigation into your complaint was in retaliation for the  
15 position he took on Ballot Measure R.

16 Did Ballot Measure R have any influence or part of  
17 motivation behind you filing your complaint for the POE  
18 violations you alleged?

19 A. No.

20 MR. DIBONA: Objection.

21 Q. (BY MR. TOKORO:) Did Ballot Measure A have any  
22 influence, motivation, any tie to the POE complaint that you  
23 filed against him?

24 MR. DIBONA: Objection. Form.

25 THE WITNESS: No.

HUNTSMAN, MAX

Page 188

1 Q. (BY MR. TOKORO:) Did Mr. Villanueva's opposition  
2 to Ballot Measure J have anything to do with the POE  
3 complaint that you filed against him?

4 MR. DIBONA: Objection. Form.

5 THE WITNESS: No.

6 Q. (BY MR. TOKORO:) Did Mr. Villanueva's refusal to  
7 enforce the County vaccine mandate as to the department have  
8 anything to do with you filing your POE complaint against  
9 him?

10 A. No.

11 Q. Did Mr. Villanueva's opposition to the County's  
12 contract with Fulgent have anything to do with the complaint  
13 that you filed with the department for his alleged POE  
14 violations?

15 A. No. Although I will quibble with the term  
16 "complaint." I filed a report, as I was required to do as a  
17 supervisor. I don't like the term "complaint" because it  
18 implies that I'm asking the County to do something, and I  
19 was legally required to provide that information to the  
20 County.

21 Q. So just to get a clear record, did  
22 Mr. Villanueva's opposition to the Fulgent contract have  
23 anything to do with you making your POE report against him?

24 A. None. Nothing.

25 Q. Mr. Villanueva has also claimed that the

HUNTSMAN, MAX

Page 189

1 investigation into your complaint and the eventual "do not  
2 rehire" placed on his file was to hinder his campaign for  
3 election to become a board supervisor.

4 Is there any truth to that, at least to your  
5 knowledge?

6 A. Not to my knowledge.

7 MR. TOKORO: Okay. No other questions. Thank  
8 you, Mr. Huntsman.

9 MR. DIBONA: I don't have any follow-up to that.

10 MR. TOKORO: Great. I think we can go off the  
11 record.

12 MR. DIBONA: Yeah.

13 COURT REPORTER: Would you like a copy,  
14 Mr. Tokoro?

15 MR. TOKORO: Yes. A copy for review can be sent to  
16 my office. Our office will order one copy of the transcript  
17 for our files.

18 (Deposition concluded at 3:09 p.m.)

19 --0o0--

20

21

22

23

24

25

HUNTSMAN, MAX

Page 191

1 C E R T I F I C A T E

2 I, the undersigned, a Certified Shorthand Reporter  
3 of the State of California, do hereby certify:

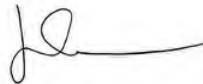
4 That the foregoing proceedings were taken before  
5 me via videoconferencing at the time and place herein set  
6 forth; that any witnesses in the foregoing proceedings,  
7 prior to testifying, were duly sworn; that a verbatim record  
8 of the proceedings was made by me using machine shorthand  
9 which was thereafter transcribed under my direction; that  
10 the foregoing transcript is a true record of the testimony  
11 given.

12 Further, that if the foregoing pertains to the  
13 original transcript of a deposition in a Federal Case,  
14 before completion of the proceedings, review of the  
15 transcript was requested.

16 I further certify I am neither financially  
17 interested in the action nor a relative or employee of any  
18 attorney or party to this action.

19 IN WITNESS WHEREOF, I have this date subscribed my  
20 name.

21 Dated: March 17, 2025



22  
23 JOHN FAHRENWALD  
24 CA CSR 14369  
25

# EXHIBIT 10



**CERTIFIED COPY**

**In the Matter Of:**

**ALEX VILLANUEVA vs COUNTY OF LOS ANGELES**

**ROBERTA YANG**

**March 10, 2025**

**Job No. 6946**

1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

3

4 ALEX VILLANUEVA, ) Case No.  
5 Plaintiff, ) 2:24-cv-04979 SVW  
6 vs. ) (JCx)  
7 )  
7 COUNTY OF LOS ANGELES, COUNTY OF )  
LOS ANGELES SHERIFF'S DEPARTMENT, )  
8 LOS ANGELES COUNTY BOARD OF )  
SUPERVISORS, COUNTY EQUITY )  
9 OVERSIGHT PANEL, LOS ANGELES )  
COUNTY OFFICE OF INSPECTOR GENERAL, )  
10 CONSTANCE KOMOROSKI, MERCEDES CRUZ, )  
ROBERTA YANG, LAURA LECRIVAIN, )  
11 SERGIO V. ESCOBEDO, RON KOPPERUD, )  
ROBERT G. LUNA, MAS-GUSTAF HUNTSMAN,) )  
12 ESTHER LIM, and DOES 1 to )  
100, inclusive, )  
13 )  
Defendants. )  
14 \_\_\_\_\_)

15

16

17 DEPOSITION OF ROBERTA YANG, taken on behalf of  
18 Plaintiff, via Zoom video conference, beginning at  
19 10:05 a.m., March 10, 2025 before WENDY L. GRAVES, RPR,  
20 Certified Shorthand Reporter No. 6138.

21

22

23

24

25

1           A P P E A R A N C E S

2   FOR THE PLAINTIFF:

3       SHEGERIAN & ASSOCIATES LLP  
4       BY: ALEX DiBONA, ESQ.  
5       11520 San Vicente Boulevard  
6       Los Angeles, California 90049  
7       (310) 860-0770  
8       ADiBona@shegerianlaw.com

9   FOR DEFENDANTS:

10       MILLER BARONDESS, LLP  
11       BY: JASON H. TOKORO, ESQ.  
12       STEVEN G. WILLIAMSON, ESQ.  
13       2121 Avenue of the Stars, Suite 2600  
14       Los Angeles, California 90067  
15       Jtokoro@millerbarondess.com

16

17

18

19

20

21

22

23

24

25

26

27

28

29

30

1 names.

2 Q. All right. What is your understanding, what  
3 broadly speaking, what is the County Equity Oversight  
4 Panel?

5 A. The County Equity Oversight Panel is a branch  
6 within the County Board of Supervisors' office, and we,  
7 a group now of 10 attorneys, we were formerly nine for  
8 the first few years after I was appointed, but we  
9 recently became 10.

10 We sit on a rotating randomized basis to review  
11 equity disciplinary recommendations coming through the  
12 county departments for a number of reasons.

13 So we review investigations and only make  
14 recommendations that the departmental management can  
15 consider.

16 Q. Separate and apart from your work with the  
17 County Equity Oversight Panel, are you currently  
18 employed?

19 A. Yes.

20 Q. Who are you currently employed by?

21 A. I have my own law corporation.

22 Q. How long, broadly speaking, have you had your  
23 own law corporation?

24 A. Well, all time in practice has been about 40  
25 plus years, and in California since 1988.

1 recollection of that?

2 A. No. No.

3 Q. Did you say anything at the hearing itself?

4 A. I don't recall.

5 Q. Do you recall anything that was said during the  
6 hearing?

7 A. No.

8 Q. Do you recall the outcome of the hearing?

9 A. Not really, but the panel only makes a  
10 recommendation, so we don't get involved with what the  
11 department does with it.

12 Q. Do you have an understanding of what your  
13 recommendation was?

14 A. On the merits, I recall at the time of the  
15 hearing that the subject was no longer an employee of  
16 the Sheriff's Department, correct.

17 Q. Do you have an understanding if there was any  
18 recommendation separate and apart -- excuse me, strike  
19 that.

20 Do you have any recollection of any  
21 recommendation the panel made to the Sheriff's  
22 Department?

23 A. Yes. Well, because the individual was no longer  
24 an employee of the Sheriff's Department, obviously, we  
25 didn't make a disciplinary recommendation, correct.

1 Q. What, if any, recommendation did you make if  
2 there was no disciplinary recommendation?

3 A. We simply asked that the file be flagged given  
4 the issues that were involved, which were substantial.

5 Q. What do you mean by "the file be flagged"?

6 A. From time to time, the panel will recommend that  
7 a file -- that a do not rehire flag be noted in the  
8 file.

9 Q. Was there a recommendation that Sheriff  
10 Villanueva had a do not rehire notation put in his  
11 personnel file?

12 A. It's whatever file they have. I don't know if  
13 it's the personnel file per se. But correct, the panel  
14 made a recommendation that a flag be placed in the file.

15 Q. It may have been in your previous answer. Why  
16 was there a recommendation for a do not rehire notation  
17 with respect to Sheriff Villanueva?

18 A. It would have been based on what we reviewed.

19 Q. Do you have -- sorry. Just to be clear. Is it  
20 your understanding the do not rehire recommendation came  
21 from the fact he was no longer an employee of the  
22 Sheriff's Department?

23 MR. TOKORO: Objection. Misstates her testimony  
24 that she gave just now, that the recommendation was  
25 based upon what was reviewed and not simply because he

1 was no longer at the department.

2 But if you can answer the question, go ahead.

3 THE WITNESS: No.

4 MR. DiBONA: Q. And do you recall one way or  
5 the other if the Sheriff's Department agreed with the  
6 recommendation that a do not rehire notation be placed  
7 in the file?

8 A. I do not recall.

9 Q. You don't remember what, if any -- I'm sorry.  
10 Just to be clear.

11 Do you remember representatives from the  
12 Sheriff's Department being there?

13 A. Yes.

14 Q. Do you recall anything representatives from the  
15 Sheriff's Department said during the panel hearing?

16 A. No.

17 Q. Do you recall at the CEOP hearing are charges,  
18 is the nomenclature for them, founded, unfounded or  
19 unresolved?

20 A. Correct. I refer to them as allegations. I  
21 don't call them charges, myself, but maybe others do.

22 Correct, those are the three options for  
23 recommendations from the panel, correct.

24 Q. Do you recall what allegations against Sheriff  
25 Villanueva were recommended as founded?

1 A. I don't recall seeing this version. I am  
2 certainly familiar with the policy of equality, but I  
3 don't remember seeing it before this way.

4 Q. Okay. Do you have a recollection that as a  
5 member of the CEOP you came to the opinion that Sheriff  
6 Villanueva subjected Max Huntsman to discrimination on  
7 the basis of race or national origin?

8 MR. TOKORO: Objection. Vague and ambiguous as  
9 to what you mean by "opinion," and also vague and  
10 ambiguous as to whether you were referring to Ms. Yang  
11 individually or CEOP as a whole.

12 MR. DiBONA: Q. You may answer.

13 A. I don't recall. The record should be clear what  
14 the panel's actions were.

15 Q. As you sit here today, do you have a  
16 recollection of the CEOP panel finding that Sheriff  
17 Villanueva engaged in an act of discrimination with  
18 respect to Max Huntsman's race or national origin?

19 A. I don't specifically recall, other than the flag  
20 on the file. But if you could show me the record of  
21 what our recommendations were, I could confirm or not.

22 Q. All right. And just to be clear, as you sit  
23 here today, do you have a recollection as to why the  
24 CEOP recommended Sheriff Villanueva have a do not rehire  
25 notation in his file?



1 A. It would have been based on the totality of the  
2 evidence as it was developed in the investigation, yes.

3 Q. All right. And do you have an understanding of  
4 what I showed you starting at page 1 of this report all  
5 the way to page 85 is the evidence collected in the  
6 investigation with respect to Max Huntsman?

7 A. I don't know if I can answer that question. The  
8 document that I see a partial salmon colored paper on my  
9 screen purports to be a Sheriff's Department document.

10 I looked at the investigation report, as well.  
11 So that's not here.

12 Q. Okay. So just to be clear, there is an  
13 investigation report that you looked at with respect to  
14 Sheriff Villanueva that's not here, not contained in  
15 this document; is that fair?

16 A. I think that's fair.

17 Q. Do you -- as you sit here today, do you recall  
18 what, in your words, the totality of the evidence was  
19 with respect to Mr. Huntsman and Sheriff Villanueva's  
20 harassment of him on the basis of race or national  
21 origin?

22 A. There may have been also a couple of other  
23 allegations. But whatever they were, it would have all  
24 been referenced in the investigation report that we were  
25 provided to review.

1 Q. Okay. And let me just go down for a second  
2 here. This document entitled Investigative Summary, is  
3 this the investigative report that you are referring to?

4 A. Yes, it looks like it. Uh-huh.

5 Q. All right. So what about -- and so do you as  
6 you sit here today, do you recall what about this report  
7 led you to believe that Max Huntsman was discriminated  
8 against on the basis of his race or national origin?

9 A. Again, there may have been other allegations,  
10 but I would have to refer you to the totality of the  
11 report itself, yes.

12 Q. And I understand that. As you sit here today,  
13 can you tell me what the totality of the report says?

14 A. Well, I'm happy to go through it with you.

15 Q. Just to be clear, you as you sit here today, you  
16 don't even have -- you can't actually me a general  
17 understanding of what the totality of the report says;  
18 is that fair?

19 MR. TOKORO: Objection. Misstates her prior  
20 testimony. She has answered this question repeatedly.  
21 If you'd like her to go through specifics she's offered  
22 to do so if you want to show her the document and walk  
23 through it with her.

24 And also, I'm just going to remind you that  
25 Ms. Yang is not here testifying as the 30(b)(6) witness.

1 look -- okay. It says Esther Lim is the complainant.

2 So we know that the Esther Lim case ends 8101.

3 Okay. Thank you.

4 Q. Let me just put back up Exhibit 8. Do you see

5 on this document there is a file number that also ends

6 in 8101?

7 A. You are correct.

8 Q. All right. One moment. Let me just --

9 something is popping up on my screen. I'm just going to

10 get rid of that real quick.

11 Just what we've done, you don't see a name but

12 based on the file number we just looked at you see it's

13 referenced to Esther Lim, correct?

14 A. Correct.

15 Q. All right. And you see here in reference to

16 Esther Lim there was a charge founded policy of a

17 equality discrimination based on gender and ethnicity?

18 A. Correct.

19 Q. And based on the previous exhibit we looked at,

20 which is Exhibit 7, why did you believe that it was more

21 likely than not Sheriff Villanueva engaged in a

22 violation of this policy with respect to Esther Lim?

23 A. I'd have to refer you to the report.

24 Q. I understand that, but that's the report we just

25 looked at, so the report you have read at least three

1 times, can you tell me why you believe the charge should  
2 be founded?

3 A. Well, I think it's for several reasons, but I  
4 wouldn't want to give you an incomplete answer. So  
5 comments about women, comments about ethnicity, women of  
6 color, those kinds of things.

7 Q. Just to be clear, when say comments about women  
8 of color, do you mean La Malinche?

9 A. Part of it, yes, but it's the entire context.  
10 So, yeah, I would just refer you back to the report.

11 Q. And the policy of equality relating to sexual  
12 harassment, the charge was unfounded in that case,  
13 correct?

14 A. Correct.

15 Q. Do you recall the basis on which the charge was  
16 unfounded?

17 A. Again, I would have to refer you to the context  
18 in the report. But, obviously, there was nothing that  
19 was substantiated for that.

20 Q. And for policy of equality discriminatory  
21 harassment based on gender and ethnicity you see here a  
22 charge founded?

23 A. Yes, I do.

24 Q. Why do you -- excuse me.

25 Based on the report, can you tell me why you

1 believe the charge should be founded related to a  
2 violation of the policy of equality for discriminatory  
3 harassment based on gender and ethnicity?

4 A. Well, I think a similar answer for the first  
5 policy of equality allegation is listed up above. So  
6 same answer.

7 Q. For policy of equality third person harassment  
8 based on gender and ethnicity, do you see here a charge  
9 founded?

10 A. Yes, I do.

11 Q. Can you tell me why you believed that this  
12 charge should be founded?

13 A. The same answer as for the first allegation.

14 Q. And for policy of equality, inappropriate  
15 conduct towards others based on gender and ethnicity you  
16 see here charge founded?

17 A. Correct.

18 Q. Can you tell me why you believe this charge  
19 should be founded?

20 A. Uh-hum. The same response as to the first  
21 allegation.

22 Q. And for policy of equality, retaliation based on  
23 gender and ethnicity, do you see here the charge  
24 founded?

25 A. Yes, I do.

1 Q. Why do you believe the charge should have been  
2 founded based on retaliation?

3 A. The same response as to allegation number one.

4 Q. And what in the report, to your recollection,  
5 references a retaliatory act?

6 A. There were any number of retaliatory acts. One  
7 I can think of, but it's not limited to just one, so I  
8 would hate to give an incomplete answer. So that's why  
9 I want to rely on the totality of what's in the report.

10 Q. What is the one you can think of?

11 A. I don't -- I need to look at the report, I  
12 think.

13 Q. Let me just bring that up again.

14 A. Right. Is there a way for me to page through  
15 it?

16 Q. If you want time to print out and to page  
17 through it, that's perfectly fine. Do you need time to  
18 do that?

19 MR. TOKORO: Alex, if you can actually give her  
20 control of the document on Zoom, she can page up and  
21 down on it. I can walk you through it if you don't know  
22 how.

23 MR. DiBONA: You can tell me the button. I'm  
24 happy to do it for this circumstance.

25 MR. TOKORO: I'm not sure what you mean by "this

1 any information as to why the investigation was  
2 conducted. Ms. Lim only knows that they went through  
3 her social media accounts. Sheriff Villanueva wrote  
4 Ms. Lim's boss, Supervisor Solis, and tried to use what  
5 Ms. Lim wrote in personal social media accounts to get  
6 her terminated in 2021 and 2022. Ms. Lim did not  
7 believe she violated any county policy with her social  
8 media posts. However, she decided that she would no  
9 longer use her personal social media accounts or  
10 Twitter. Ms. Lim knows there are other deputies with  
11 social media accounts. Sheriff Villanueva complained  
12 that Ms. Lim was not fired and asked why the supervisors  
13 did not discipline her."

14 Did I read that correctly?

15 A. Well, supervisors, singular, not plural. But  
16 yes, in general, yes.

17 Q. So having had a chance to read what's in the  
18 letter, what basis is there to connect this to her  
19 gender or ethnicity?

20 A. No, your question was about retaliation. That's  
21 the allegation.

22 Q. Yes, and the charge founded, if we to go  
23 Exhibit 8 is retaliation based on gender and ethnicity.

24 A. Right. So again looking at the totality of the  
25 evidence that was developed, there was also plenty to

1 say as to why he targeted her. She was Asian. She --  
2 as I understand it, these were social media accounts  
3 that were personal. They weren't even related to her  
4 job with the county.

5 So, yeah, that's one example from the report of  
6 several others.

7 Q. I understand that. Sticking with this one, why  
8 do you believe there was a reference he sent this letter  
9 because she was Asian?

10 A. Yes. It was part of his targeting of her is  
11 what she said.

12 MR. TOKORO: Objection. Asked and answered, and  
13 it also says it in the first sentence of what you read  
14 to her. So it misstates -- well, I will leave my  
15 objection there.

16 MR. DiBONA: Q. You may answer, Ms. Yang.

17 A. I don't have anything to add.

18 Q. Over the objection, there wasn't an answer.

19 A. Well, I would direct you to the two paragraphs  
20 you just read to me, the first one starting off,  
21 "According to Miss Lim, Sheriff Villanueva targeted her  
22 like he had targeted other Asian women," and this was an  
23 example.

24 Q. So just to be clear, you believe what Ms. Lim  
25 says is true; that's fair to say?



1 A. I believed it to be true in the context of the  
2 totality of the investigation, true.

3 Q. Do you recall any evidence that Ms. Lim had that  
4 says she was targeted because she was Asian?

5 A. Yes, I do.

6 Q. What was that?

7 A. The other evidence was there was some other  
8 county executive that was also targeted, and so it  
9 wasn't just Miss Lim by herself. That's what I recall.

10 Q. Yeah, the county executive was a criminal  
11 investigation was opened against her, correct?

12 A. It's whatever the report says about it.

13 Q. One moment. Pull that up here. One moment.  
14 Sorry. I am going to put this back on.

15 All right. Do you see here under History of  
16 Intimidation of Women of Color?

17 A. Right.

18 Q. There is a reference: He also harassed the  
19 former -- former County CEO, excuse me, who was also a  
20 minority woman. Did I read that correctly?

21 A. Yes. In fact, I'm so glad you pointed out this  
22 paragraph, because I think this is the answer to your  
23 question, it comes right out of the board itself is this  
24 paragraph.

25 Q. So just to be clear, you believe that opening up

1 terminology.

2       You once again, Alex, referred to notification  
3 instead of notation. I'm just making sure the record is  
4 clear on that. You are welcome to leave the question as  
5 is or reask it. It's up to you.

6       MR. DiBONA: I don't know if I did or not, but  
7 just to be clear.

8       Q. What circumstances is it appropriate to use the  
9 do not rehire notation in the context of the CEOP?

10      A. Number one, it is only a notation. Number two,  
11 it simply what I call a flag. That the file may need  
12 additional review in the event the individual who was  
13 the subject of the file desires to seek reemployment  
14 with the same department. It's not something unique to  
15 the Sheriff's Department, no.

16      Q. Is it your testimony, by the way, that the do  
17 not rehire notation does not mean do not rehire this  
18 person?

19      A. Correct.

20      Q. Has that been a tool in the toolbox since 2018,  
21 when you came on the CEOP, to your knowledge?

22      A. Yes.

23      Q. Without telling me details of who, prior to Alex  
24 Villanueva, had you been on panels that recommended a do  
25 not retire notation?

1 but I am certainly going to mull over it.

2 MR. DiBONA: Apologies. I don't have any  
3 further questions, but your counsel might, Miss Yang.

4 MR. TOKORO: I do. I have a few follow-up  
5 questions. Wendy, are we okay just continuing.

6 (Discussion off the record.).

7 EXAMINATION BY MR. TOKORO

8 MR. TOKORO: Q. Ms. Yang, you were asked some  
9 questions about who attended the CEOP prehearing and  
10 hearing in this matter by Mr. DiBona. Do you recall  
11 that?

12 A. Yes.

13 Q. Has any member of the Board of Supervisors ever  
14 attended a CEOP hearing during the time you have been on  
15 the panel?

16 A. No. Not even a prehearing. No part of it.

17 Q. Has any Sheriff of Los Angeles County attended  
18 any CEOP prehearing or hearing during the time you have  
19 been on the panel?

20 A. No.

21 Q. Now, in this case, Mr. Villanueva has claimed  
22 that the do not rehire notation was given to him in part  
23 in retaliation for positions he took publicly on certain  
24 things before the board.

25 I want to ask you about those.

1 Mr. Villanueva has claimed that his public  
2 statements about Measure A were part of the reasoning  
3 behind the do not rehire notation. Are you aware of  
4 Mr. Villanueva's public statements about Measure A?

5 A. No, and I don't even know what Measure A is.

6 Q. Did Measure A have anything to do with the  
7 CEOP's recommendation or your recommendation that  
8 Mr. Villanueva be given a do not rehire notation?

9 A. No.

10 Q. Now, did Measure J -- let me restart that.  
11 Are you aware of any public statements made by  
12 Mr. Villanueva about Measure J?

13 A. No.

14 Q. Did Measure J have anything to do with the  
15 recommendation by the CEOP to give Mr. Villanueva a do  
16 not rehire notation?

17 A. I don't know what Measure J is. No.

18 Q. Do you know, have you ever heard any public  
19 statements made by Mr. Villanueva about Measure R?

20 A. No.

21 Q. Did Measure R have anything to do with your --  
22 with the panel's recommendation to give Mr. Villanueva a  
23 do not rehire notation?

24 A. No, and I don't know what Measure R is.

25 Q. Are you aware of any public statements regarding

1 Mr. -- let me restart.

2 Are you aware of any public statement by

3 Mr. Villanueva regarding the county's vaccine mandate

4 during the Covid pandemic?

5 A. No.

6 Q. Did Mr. Villanueva's position on vaccine

7 mandates have anything to do with the panel's

8 recommendation to issue, to give him a do not hire

9 notation?

10 A. No.

11 Q. Are you aware of Mr. Villanueva's public

12 statements regarding the county's contract with Cogent

13 regarding Covid testing?

14 A. No.

15 Q. Did the county contract -- did Mr. Villanueva's

16 position regarding the Cogent contract have anything to

17 do with the panel's recommendation that he be given the

18 do not hire notation?

19 A. No. And I also don't even know what his

20 position regarding that name is.

21 Q. Now, Mr. Villanueva has also claimed in this

22 case that the panel's recommendation that he be given a

23 do not rehire notation related to the fact that he was

24 running for a seat with the Board of Supervisors.

25 When the pre -- I want to ask you. When the

1 briefing, sorry.

2 When the CEOP hearing happened in October of  
3 2023, were you aware that Mr. Villanueva was running for  
4 the Board of Supervisors?

5 A. No.

6 Q. Did Mr. Villanueva running for the Board of  
7 Supervisors have anything to do with the panel's  
8 recommendation that he be given a do not rehire  
9 notation?

10 A. No, and I didn't even know he was running for  
11 the Board of Supervisors.

12 Q. Now, I want to change topics.

13 Mr. DiBona asked you a question about whether  
14 the do not hire notation is appropriate for former  
15 employees or a consideration when it comes to former  
16 employees of the county. Do you recall that?

17 A. Yes.

18 Q. Now, in what situation would you say the do not  
19 hire notation is, as you said, a tool available to the  
20 panel?

21 A. Well, I think it can apply to a couple  
22 situations. I mean, one, after I thought about it after  
23 he asked the question. The panel has from time to time  
24 recommended termination or discharge of current  
25 employees.

1 In those situations the panel may consider a do  
2 not hire flag on that personnel file just to be sure  
3 among hundreds of files that are reviewed by human  
4 resources departments throughout the county that there  
5 is some history there that's worth looking at. That's  
6 all it really means.

7 Q. So in that circumstance, since the person hasn't  
8 been terminated, is the person a current employee  
9 because they haven't been terminated; is that correct?

10 A. That's correct.

11 Q. And is the do not rehire also a tool that can be  
12 used for former county employees like Mr. Villanueva?

13 A. Yes.

14 Q. Now, you were asked a number of questions by  
15 Mr. DiBona about whether the CEOP panel makes  
16 credibility determinations regarding witnesses. Do you  
17 recall that?

18 A. Yes.

19 Q. I think you said you would have to look at it in  
20 the totality of the report of what was contained in the  
21 report. Is that fair?

22 A. Correct.

23 Q. Now, when you are looking at the credibility of  
24 a witness, in addition to having it set forth in the  
25 report, would you also look at whether there were

YANG, ROBERTA

Page 137

1 I have read the foregoing deposition  
2 transcript and by signing hereafter, subject to  
3 any changes I have made, approve same.

4  
5 Dated March 26, 2025.

6  
7  
8 Roberta M. Vg

9 (Signature of Deponent)  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25



1 STATE OF CALIFORNIA )

2 COUNTY OF LOS ANGELES )

3 I, WENDY L. GRAVES, CSR, hereby certify that the  
4 witness in the foregoing deposition named ROBERTA YANG  
5 was by me duly sworn to tell the truth, the whole truth,  
6 and nothing but the truth in the within-entitled cause;  
7 that said deposition was taken at the time and place  
8 therein stated; that the testimony of said witness was  
9 reported by me in shorthand writing and was thereafter  
10 transcribed by computer under my direction; that the  
11 foregoing is a full, complete, and true record of said  
12 testimony; and that the witness was given an opportunity  
13 to read and correct said deposition and to subscribe the  
14 same.

15 I further certify that I am not of counsel or  
16 attorney for any of the parties in the foregoing  
17 deposition or in any way interested in the outcome of  
18 the cause named in said caption.

19 IN WITNESS WHEREOF, I have hereunto set my hand  
20 this 18th day of March, 2025.

21

22



23

24

WENDY L. GRAVES, CSR NO. 6138

25

STATE OF CALIFORNIA

YANG, ROBERTA

Page 139

1	Deponent's Correction Sheet		
2	To add testimony, indicate "Add" and print the exact words you wish to add. To delete testimony, indicate		
3	"Delete" and print the exact words you wish to delete.		
4	Deposition of: ROBERTA YANG		
5	Deposition Date: March 10, 2025		
6	I, ROBERTA YANG, have the following changes to my deposition transcript:		
7			
8	PAGE	LINE	CHANGE (Add/Delete)
9	34	23	Delete "a parent"
10	34	23	Add "an apparent"
11	Exh 2, label		Delete "Wang"
12	Exh 2, label		Add "Yang"
13	___	/ ___	/
14	___	/ ___	/
15	___	/ ___	/
16	___	/ ___	/
17	___	/ ___	/
18	___	/ ___	/
19	___	/ ___	/
20	___	/ ___	/
21	___	/ ___	/
22	___	/ ___	/
23	Robert M. Uy, 3-26-25		
24	ROBERTA YANG		Date
25			

# EXHIBIT 11

**CERTIFIED COPY**



1605 W. Olympic Blvd., Suite 800 Los Angeles, CA 90015

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

**ALEX VILLANUEVA vs COUNTY OF LOS ANGELES**

**ESTHER LIM**

**March 21, 2025**

**Shannon D. Denney, CSR No. 10385, Job No. 6454**

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ALEX VILLANUEVA, )  
 )  
 Plaintiff, )  
 )  
 vs. ) No: 2:24-cv-04979  
 ) SVW (JCx)  
 COUNTY OF LOS ANGELES, COUNTY OF )  
 LOS ANGELES SHERIFFS DEPARTMENT, )  
 LOS ANGELES COUNTY BOARD OF )  
 SUPERVISORS, COUNTY EQUITY )  
 OVERSIGHT PANEL, LOS ANGELES COUNTY )  
 OFFICE OF INSPECTOR GENERAL, )  
 CONSTANCE KOMOROSKI, MERCEDES CRUZ, )  
 ROBERTA YANG, LAURA LECRIVAIN, )  
 SERGIO V. ESCOBEDO, RON KOPPERUD, )  
 ROBERT G. LUNA, MAX-GUSTAF HUNTSMAN )  
 ESTHER LIM, and DOES 1 to 100, )  
 inclusive, )  
 )  
 Defendants. )  
 \_\_\_\_\_ )

DEPOSITION OF: ESTHER LIM

March 21, 2025

REPORTED BY: SHANNON D. DENNEY, CSR No. 10385

LIM, ESTHER

Page 2

1 APPEARANCES

2

3 For the Plaintiff:

4 SHEGERIAN & ASSOCIATES, INC.  
5 BY: ALEX DIBONA, ESQ.  
6 aDiBona@shegerianlaw.com  
11520 San Vicente Boulevard  
Los Angeles, CA 90049

7

8 For the Defendants:

9 MILLER BARONDESS, LLP  
10 BY: JASON H. TOKORO, ESQ.  
STEVEN WILLIAMSON, ESQ.  
11 jtokoro@millerbarondess.com  
2121 Avenue of the Stars, Suite 2600  
Los Angeles, CA 90067

12

13

14

15

16

17

18

19

20

21

22

23

24

25

LIM, ESTHER

Page 149

1 Q. Apart from acknowledging it, did she ever  
2 send any other response?

3 A. I don't recall.

4 Q. By the way, did you feel the need to tell Ms.  
5 Chen you put a lot of thought into this, even before  
6 the March 4th letter to Supervisor Solis?

7 A. I was conveying to my supervisor, out of  
8 courtesy, that I was filing this, but also why.

9 Q. I'm going to send Exhibit 7 through the chat.  
10 I'm sorry, one moment.

11 Do you see a document on your screen, Ms.  
12 Lim?

13 A. Yes, I do.

14 Q. Exhibit 7 is COLA02614 to 2618.

15 And again -- excuse me.

16 Is this a confirmation of the complaint you  
17 filed with the County Equity Oversight Panel against  
18 Sheriff Villanueva on or about March 8, 2022?

19 A. Yes.

20 Q. And did you have an understanding, when  
21 filling out this complaint, it was important for you to  
22 be truthful?

23 A. Yes.

24 Q. And did you have an understanding, when  
25 filling out this complaint, it was -- it was important

LIM, ESTHER

Page 165

1 the time you were interviewed, to your knowledge, did  
2 the CPOE take any action on your complaint, that you're  
3 aware of?

4 A. I do not know. I know -- I don't know.

5 Q. At some point in time -- do you know the name  
6 Christina Diaz-Herrera?

7 A. Yes. I believe she interviewed me in  
8 response to my CPOE complaint.

9 Q. Prior to Ms. Diaz-Herrera interviewing you,  
10 had you ever had any interactions with her?

11 A. I don't believe so.

12 Q. And at the time Ms. Diaz-Herrera interviewed  
13 you, did you have an understanding she worked for the  
14 law firm of Sanders Roberts?

15 A. Yes. I believe she shared that that's where  
16 she worked.

17 Q. And prior to your interview with Ms.  
18 Diaz-Herrera, had you ever had any interaction with  
19 anybody at Sanders Roberts?

20 A. Not that I recall.

21 Q. And when you were interviewed, how were you  
22 interviewed, did you go in person, was it over Zoom?

23 A. I believe it was either over zoom or over a  
24 phone call.

25 Q. And to your understanding, was it recorded?



LIM, ESTHER

Page 197

1 or suspicion Sheriff Villanueva had to open a criminal  
2 investigation on the former CEO?

3 MR. TOKORO: Objection. Document speaks for  
4 itself.

5 It also misstates her prior testimony when  
6 she said, sitting here today she doesn't recall all the  
7 details of it. She referenced COC report she was  
8 familiar with at the time.

9 But otherwise, you can answer.

10 THE WITNESS: Mr. DiBona, I don't know the  
11 specifics.

12 And I shared, I did say that I had read  
13 documents, whether it was from the Sheriff's Civilian  
14 Oversight Commission, or the Office of Inspector  
15 General. I had referenced the investigation into  
16 former CEO Sachi Hamai.

17 Q. MR. DiBONA: By the way, what motions did you  
18 draft around sheriff accountability?

19 A. I do not have a complete list of all the  
20 motions I have written.

21 But as referenced in my CPOE complaint, one  
22 of them is around providing further protection against  
23 surviving families of law enforcement harassment, and  
24 intimidation.

25 Q. By the way, as far as you know, did you say

LIM, ESTHER

Page 198

1 anything untruthful to Ms. Diaz-Herrera?

2 A. No.

3 Q. If I go down just COLA 002175.

4 Have you seen this document before?

5 MR. TOKORO: Caution you not to disclose any  
6 communication you had in connection with us sending you  
7 the pleadings, and other materials in connection with  
8 this case.

9 But you can otherwise answer these questions.

10 THE WITNESS: Mr. DiBona, can you scroll  
11 down, please?

12 Q. MR. DiBONA: Yes.

13 A. Do you mind if you keep scrolling? I just  
14 need see the full document.

15 Q. Just if you need me to keep scrolling down,  
16 at any point, just let me know. I'm happy to keep  
17 doing it. If of you need me stop or go back, that's  
18 fine.

19 A. Yes. I think this is my CPOE.

20 Q. And so --

21 A. I don't know if this is my CPOE complaint, or  
22 not. Just doesn't look familiar.

23 Q. Sorry to ask this.

24 But is your date of birth July 30th, 1981?

25 A. Yes.

LIM, ESTHER

Page 200

1 question, yes. Yes, 40 is a larger number than 20.

2 But in reference of Mr. Villanueva's comments  
3 about degrading me, and calling me a woke 25 year old,  
4 or 20 year old, then it was a very offensive.

5 Q. MR. DiBONA: And by the way, what's your  
6 understanding of the term "woke?"

7 A. It depends on the context, Mr. DiBona.

8 So the context which Mr. Villanueva was  
9 using, when he was sheriff, it was used as  
10 pejorative.

11 Q. And other than it's pejorative in the context  
12 Sheriff Villanueva was using it, what was your  
13 understanding of what he was trying to say?

14 MR. TOKORO: Objection. Vague and ambiguous.

15 I'm not sure you can answer that question,  
16 other than the pejorative. But otherwise, you can  
17 answer the question.

18 THE WITNESS: I don't believe that Sheriff  
19 Villanueva was utilizing the label as "woke" as a  
20 friendly term when referencing it to me, and the other  
21 justice deputy.

22 Q. MR. DiBONA: My question wasn't -- there may  
23 not be another answer to this, but that's -- that's  
24 still why I'll asking.

25 Other than that it was pejorative, do you

LIM, ESTHER

Page 201

1 have any opinion about what Sheriff Villanueva was  
2 saying when he referred to you that way?

3 A. I took it to be offensive that the reasons  
4 for our motions were based upon either feelings, or  
5 values outside of holding the Sheriff's and the Sheriff  
6 Department accountable for his conduct.

7 Q. And did you ever hear Sheriff Villanueva give  
8 a definition of "woke?"

9 A. I have not heard every single Facebook live,  
10 or seen every single Facebook live, or Instagram lives  
11 or any or all Mr. Villanueva's documents or statements.  
12 So I do not know if he has defined "woke."

13 Q. Did you, by the way, after you were  
14 interviewed by Ms. Diaz-Herrera, were you ever informed  
15 of any other steps of the investigation?

16 MR. TOKORO: Object.

17 Again, that calls for you to not disclose any  
18 communications you had with your counsel.

19 If you're referring to prior to litigation,  
20 if you want to define it in a period of time, I think  
21 that might be --

22 Q. MR. DiBONA: Yeah. I don't think that was my  
23 question. But fair enough. Let me just define.

24 Prior to any conversations you may or may not  
25 have had with counsel regarding this lawsuit, were you

LIM, ESTHER

Page 243

1 now part of my role as a justice deputy -- I was saying  
2 that my tweets are not part of my role as a justice  
3 deputy.

4 Q. So the tweets that you were sending, were you  
5 sending that in your capacity as just a resident of the  
6 county?

7 MR. DiBONA: Objection. Form.

8 THE WITNESS: Yes. As a private citizen.

9 Q. MR. TOKORO: And you been using your private  
10 Twitter account, is that correct, or your personal  
11 Twitter account?

12 A. Yes. I was using my personal Twitter  
13 account.

14 Q. Now Mr. DiBona asked you some questions about  
15 whether Mr. Villanueva has ever referred to you on  
16 specifically in any of his Facebook live streams.

17 Do you recall that?

18 A. Yes, I do.

19 Q. Are you aware that Mr. Villanueva has in fact  
20 referred to you specifically in Facebook live streams,  
21 even since this lawsuit was filed?

22 MR. DiBONA: Objection. Form.

23 THE WITNESS: Yes. I am actually aware that  
24 he -- that Mr. Villanueva still continues to talk about  
25 me on his Facebook lives.

LIM, ESTHER

Page 244

1 Q. MR. TOKORO: In fact, are you aware that on  
2 September 25 of 2024, Mr. Villanueva said, apparently,  
3 there's another debate set to happen, and we have some  
4 news. We just learned today Esther Lim the, I guess  
5 disgruntled former employee, or deputy of Supervisor  
6 Hilda Solis. She left that office and she's found a  
7 soft landing with George Gascon, working directly under  
8 Tiffany Blackwell -- Blacknell.

9 Are you aware of these statements?

10 MR. DiBONA: Objection. Form.

11 THE WITNESS: Yes. I am.

12 Q. MR. TOKORO: And how did you find out about  
13 them?

14 A. I found out about them because a friend told  
15 me that Mr. Villanueva was still talking about me on  
16 his Facebook lives.

17 Q. And what was your reaction when you heard  
18 that he was still talking about you on his Facebook  
19 lives?

20 A. I think it just shows the pattern of  
21 Mr. Villanueva's attempt to again, threaten, harass,  
22 intimidate, demean me, not just when I was a justice  
23 deputy, but continues to do that.

24 And in fact, this one was particularly -- I  
25 would say particularly difficult.

LIM, ESTHER

Page 245

1 Q. Why would you say it's particularly  
2 difficult?

3 A. I would say that because as soon as this  
4 Facebook live happened, a couple days after when  
5 Mr. Villanueva shared that I was at the DA's office, my  
6 house was actually burgled. In a place that I have  
7 lived for several years.

8 And I had also learned that another colleague  
9 of mine, her car was vandalized, along with a DA Gascon  
10 sign that was also vandalized.

11 And so as I had shared in my earlier  
12 testimony, that these are -- that I feel very  
13 threatened, and continue to feel threatened because  
14 Mr. Villanueva continues to talk about me. So this  
15 particular one was difficult, because of what happened  
16 shortly thereafter.

17 Q. When you heard about these statements, did  
18 you have any concern that again, Mr. Villanueva was  
19 coming after you, and your employment with the  
20 county?

21 MR. DiBONA: Objection. Form.

22 THE WITNESS: Yes. Yes, I did.

23 Q. MR. TOKORO: Much like you did he sent the  
24 letters to Supervisor Solis correct?

25 MR. DiBONA: Objection. Form.

LIM, ESTHER

Page 246

1 THE WITNESS: Correct. He not only sent  
2 those two letters to Supervisor Solis, as well as  
3 justice deputy. But again. You know, as soon as I  
4 start a new employment, with a new employer, District  
5 Attorney George Gascon, he then goes back on his  
6 Facebook live and again, tries to demean me, and  
7 attacks my credibility.

8 And again, you know, I think I already shared  
9 this was particular difficult because how it impacted  
10 my personal life, but the personal, and professional  
11 life.

12 Q. MR. TOKORO: Are you aware that, much like  
13 Mr. DiBona today, in the same Facebook live from  
14 September 25 of 2024 that Mr. Villanueva, repeatedly  
15 referred to you as not being a lawyer?

16 MR. DiBONA: Objection. Form.

17 THE WITNESS: Yes.

18 Q. MR. TOKORO: In fact, are you aware that he  
19 says, now, the weird thing is they created a job just  
20 for her. She's not a lawyer. Okay. She's not a  
21 lawyer. What is she doing there? I have no idea. In  
22 fact, taxpayers should be able to have an answer to  
23 that. Maybe Mr. Gascon can explain what exactly is Ms.  
24 Lim doing in your office, and why do this in secret.  
25 How come no one else was able to apply to this job. It



LIM, ESTHER

Page 247

1 is quite possible that Mr. Gascon is using her as a  
2 connection to the far-left, ultra-progressive crowd as  
3 she favors and communicates with.

4 Are you aware of that?

5 A. Yes.

6 MR. DiBONA: Objection. Form.

7 THE WITNESS: Yes, I am.

8 Q. MR. TOKORO: And when you heard that he had  
9 been making these statements about you, what was your  
10 reaction?

11 A. Again, I think this is Mr. -- I feel like  
12 this is the way Mr. Villanueva continues to try to  
13 demean me, continues to attack my credibility,  
14 continues to attack my experiences, and my expertise in  
15 the justice forum space by making these -- by making  
16 these type comments, and will demean my employer.

17 Q. Are you also aware that Mr. Villanueva went  
18 on to, again, saying, she is not an attorney. And  
19 typically, every job that goes to the DA particularly  
20 along those lines, they're all attorneys. And she is  
21 not one?

22 MR. DiBONA: Objection to form.

23 I'm sorry.

24 Objection to form.

25 Q. MR. TOKORO: I'm still reading, Alex.

LIM, ESTHER

Page 248

1 And she's not one. So how does she land this  
2 special job that no one else had the right to apply  
3 for? What were her special skills that merit she  
4 should be the only person to get this job?

5 MR. DiBONA: Objection. Form.

6 Q. MR. TOKORO: Are you aware that he made those  
7 statements as well?

8 A. Yes, I am.

9 Q. And when you applied for this job, was it a  
10 requirement you have a law degree?

11 A. No. It was not.

12 Q. Now, are you also aware Sheriff Villanueva  
13 has made additional comments about you as recently as  
14 December of 2024?

15 A. I am not. But it does not surprise me.

16 Q. And these are -- these statements made in  
17 September of 2024, those were months after that lawsuit  
18 got filed, correct?

19 A. Yes.

20 Q. Are you aware that in December of 2024,  
21 Mr. Villanueva says, Esther Lim, one of the two  
22 complainants, no comment. But the other one, of  
23 course, Max Huntsman, he can't resist, right? The  
24 opinions speaks for itself, he told the Times.

25 Are you aware of those statements?

LIM, ESTHER

Page 249

1 A. No.

2 MR. DiBONA: Objection. Form.

3 THE WITNESS: No, I am not.

4 Q. MR. TOKORO: Are you aware that Sheriff  
5 Villanueva went to -- he was asked a question, sheriff,  
6 what is your opinion of the new DA of LA County? And  
7 his response, well, he is off to a good start. His  
8 first day in office he got rid of a bunch of people  
9 that needed to be get -- need to be getting rid of,  
10 Esther Lim, who was kicked out of Hilda Solis' office,  
11 sought refuge with Gascon. She got fired by Hochman,  
12 and that's good.

13 Did you know that?

14 A. No. I did not.

15 Q. Did you get kicked out of Hilda Solis'  
16 office?

17 A. No. I did not.

18 Q. Did you seek refuge with Gascon?

19 A. No. I did not.

20 MR. DiBONA: Objection. Form.

21 Q. MR. TOKORO: What is your reaction to these  
22 statements?

23 MR. DiBONA: Objection. Form.

24 THE WITNESS: This is misinformation. This  
25 is, again, trying to ruin my credibility in a

LIM, ESTHER

Page 250

1 professional space by telling -- actually telling lies  
2 about my circumstances and leaving Supervisor Solis'  
3 office, or even how I started working with DA Gascon's  
4 office.

5 Q. MR. TOKORO: So as recently as of December of  
6 2024, Mr. Villanueva was specifically referring to you  
7 in his Facebook lives, correct?

8 A. Yes.

9 MR. DiBONA: Objection. Form.

10 Q. MR. TOKORO: Now, I want to ask you about  
11 some of the allegations being made against you in this  
12 case, which Mr. DiBona did not ask you about.

13 When you filed your CPOE complaint in March  
14 of 2022, did anyone of the Board of Supervisors have  
15 any hand in that?

16 A. No. They did not.

17 Q. Did anyone of the Board of Supervisors talk  
18 to you before you filed your CPOE complaint?

19 A. No. They did not.

20 Q. Did anyone of the Board of Supervisors direct  
21 you to file your CPOE complaint against  
22 Mr. Villanueva?

23 A. No. They did not.

24 Q. Did Supervisor Solis direct you to file the  
25 complaint against Mr. Villanueva?

LIM, ESTHER

Page 251

1 A. No. She did not.

2 Q. Did Supervisor Kuehl direct you to file the  
3 complaint?

4 A. No. She did not.

5 Q. Did Supervisor Hahn direct you to file the  
6 complaint?

7 A. No. She did not.

8 Q. Any of the supervisors, at that time, March  
9 2022, direct you to file that complaint?

10 A. No. They did not.

11 Q. Did sheriff Luna have any involvement in you  
12 filing your POE complaint in the spring of 2022?

13 A. No. He did not.

14 Q. In fact, in the March of 2022, Mr. Villanueva  
15 was still sheriff of the Sheriff's Department,  
16 correct?

17 A. Yes.

18 Q. So did you have any conversations with  
19 Mr. Luna before filing your complaint?

20 A. No. I did not.

21 Q. Have you of had a conversation with Mr. Luna,  
22 with Sheriff Luna, at any point in time, regarding your  
23 POE complaint against Mr. Villanueva?

24 A. No. I did not.

25 Q. Now, Mr. Villanueva has claimed that your

LIM, ESTHER

Page 252

1 complaint was part of retaliation by the Board for  
2 positions he took on board measures, and other issues  
3 in front of the Board. I want to talk to you about  
4 those.

5 Did Mr. Villanueva's position on Measure A  
6 have anything to do with your filing of the DOE  
7 complaint?

8 A. No. It did not.

9 Q. Did Measure A have anything to do with you  
10 filing your POE complaint?

11 A. No. It did not.

12 Q. Did Mr. Villanueva's position on Measure R  
13 have anything to do with you filing your POE  
14 complaint?

15 A. No. It did not.

16 Q. Did Measure R, in any way, have anything to  
17 do with you filing your complaint?

18 A. No. It did not.

19 Q. Did Mr. Villanueva's position on Measure J  
20 have anything to do with you filing your complaint?

21 A. No. It did not.

22 Q. Did Measure J, in any way, shape, or form  
23 have anything do with you filing your complaint?

24 A. No. It did not.

25 Q. Now, Mr. Villanueva spoke out against

LIM, ESTHER

Page 253

1 endorsing the COVID vaccine mandate during the  
2 pandemic.

3 Are you aware of that?

4 A. Yes.

5 Q. Did his position on the mandatory vaccine --  
6 vaccination of how the employees have anything do with  
7 you filing your POE complaint?

8 A. No. It did not.

9 Q. Did vaccine mandates, the county's vaccine  
10 mandates have anything do with you filing your  
11 complaint?

12 A. No. It did not.

13 Q. Mr. Villanueva also spoke out against a  
14 county contract with Full Gen relating to COVID  
15 testing.

16 Are you aware of that?

17 A. Yes, I am.

18 Q. Did his position or opposition to the Full  
19 Gen contract have anything do with your reporting of  
20 POE complaint?

21 A. No. It did not.

22 Q. Did the Full Gen contract, in any way, shape,  
23 and form, have any way, shape, or form have anything to  
24 do with the complaint that you filed?

25 A. No. It did not.

LIM, ESTHER

Page 254

1 Q. Now, other than being interviewed by Ms.  
2 Christine Diaz-Herrera, as part of the investigation  
3 into your complaint, did you have any other involvement  
4 into the investigation?

5 MR. DiBONA: Objection. Form.

6 THE WITNESS: No. No. I did not.

7 Q. MR. TOKORO: Did you have any interactions  
8 with anyone at the Sheriff's Department after the  
9 Sanders Roberts investigation was completed, but before  
10 it went to the CEOP?

11 A. No. It did not.

12 Q. Do you know what the CEOP is?

13 A. Yes, I do.

14 Q. You understand it's County Equity Oversight  
15 Panel?

16 A. Yes.

17 Q. Now, did you attend the CEOP hearing at which  
18 your complaint was decided?

19 A. No.

20 Q. Did you have any involvement in the CEOP's  
21 recommendations relating to your complaint, other than  
22 filing the complaint?

23 A. No.

24 Q. Did you have any involvement into the  
25 department concurring with the CEOP's recommendations



LIM, ESTHER

Page 255

1 about your complaint?

2 A. No.

3 MR. TOKORO: That's all I've got, Alex.

4

5 FURTHER EXAMINATION BY

6 Q. MR. DiBONA: Just a couple follow-up  
7 questions.

8 Ms. Lim, since your attorney saw fit to ask  
9 you about it, why did you leave Hilda Solis' office?

10 A. I wanted -- I had been with Supervisor Solis'  
11 office for four years, and I wanted to gain some  
12 different experience.

13 Q. Did you voluntarily resign from Hilda Solis'  
14 office?

15 A. Yes, I did.

16 Q. And how long after you resigned did you get  
17 your job with George Gascon?

18 A. I believe it was about a month later.

19 Q. And at the time you resigned from Hilda  
20 Solis' office, did you already have the job with George  
21 Gascon lined up?

22 A. No. I did not.

23 Q. And so the -- at the time you resigned, did  
24 you know where you were going to work?

25 A. At the time, I did not.

LIM, ESTHER

Page 263

1 STATE OF CALIFORNIA

2

3

4 I, SHANNON D. DENNEY, CSR 10385, a Certified  
5 Shorthand Reporter in and for the State of California,  
6 do hereby certify that, prior to being examined, the  
7 witness named in the foregoing deposition was by me  
8 duly sworn to testify the truth, the whole truth, and  
9 nothing but the truth; that said deposition was taken  
10 down by me in shorthand at the time and place named  
11 therein and was thereafter transcribed under my  
12 supervision; that this transcript contains a full, true  
13 and correct record of the proceedings which took place  
14 at the time and place set forth in the caption hereto.

15 I further certify that I have no interest in  
16 the event of this action.

17

18 EXECUTED this 1st day of April, 2025.

19

20

21

Shannon D. Denney

22

Shannon D. Denney, CSR 10385

23

24

25

# EXHIBIT 12

CERTIFIED COPY

**Express Deposition Services**



by EXPRESSNETWORK

1605 W. Olympic Blvd., Suite 800 Los Angeles, CA 90015

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA , WESTERN DIVISION

ALEX VILLANUEVA vs COUNTY OF LOS ANGELES

LAURA LECRIVAIN

March 25, 2025

Cila Meyer, CSR No. 4914, Job No. 6901

1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA , WESTERN DIVISION  
3

4 \_\_\_\_\_ )  
ALEX VILLANUEVA, )  
5 )  
Plaintiff, )  
6 )  
vs. ) Case No.:  
7 ) 2:24-cv-04979 SVW (JCx)  
COUNTY OF LOS ANGELES, COUNTY OF LOS )  
8 ANGELES SHERIFF'S DEPARTMENT, LOS )  
ANGELES COUNTY BOARD OF SUPERVISORS, )  
9 COUNTY EQUITY OVERSIGHT PANEL, LOS )  
ANGELES COUNTY OFFICE OF INSPECTOR )  
10 GENERAL, CONSTANCE KOMOROSKI, MERCEDES )  
CRUZ, ROBERTA YANG, LAURA LECRIVAIN, )  
11 SERGIO V. ESCOBEDO, RON KOPPERUD, ROBERT )  
G. LUNA, MAX GUSTAF HUNTSMAN, ESTHER )  
12 LIM, and DOES 1 to 100, inclusive, )  
 )  
13 Defendants. )  
\_\_\_\_\_ )

14

15

16

17 Videoconference Deposition of

18 LAURA LECRIVAIN, taken on behalf of Plaintiff,

19 Remote Via Zoom, beginning at 10:03 a.m.,

20 Tuesday, March 25, 2025, before Cila Meyer,

21 No. 4914, a Certified Shorthand Reporter.

22

23

24

25

LECRIVAIN, LAURA

Page 3

1 APPEARANCES OF COUNSEL:

2

3 For the Plaintiff:

4 ALEX DiBONA, ATTORNEY AT LAW  
5 ANNA KHACHATRY, ATTORNEY AT LAW  
6 SHEGERIAN & ASSOCIATES, INC.  
7 11520 San Vicente Boulevard  
8 Los Angeles, California 90049  
9 310.860.0770  
10 adibona@shegerianlaw.com  
11 akhachatry@shegerianlaw.com

12 For the Defendants:

13 JASON H. TOKORO, ATTORNEY AT LAW  
14 STEVEN WILLIAMSON, ATTORNEY AT LAW  
15 MILLER BARONDESS, LLP  
16 2121 Avenue of the Stars  
17 Suite 2600  
18 Los Angeles, California 90067  
19 jtokoro@millerbarondess.com  
20  
21  
22  
23  
24  
25

LECRIVAIN, LAURA

Page 31

1 Q And did he give you any facts about what the  
2 case was about?

3 A No, he did not.

4 Q And did he tell you how it was going to be  
5 adjudicated?

6 A No, he did not.

7 Q What, if anything, did you say to Captain  
8 Kopperud or Kopperud? Excuse me.

9 A I don't recall exactly what I said to him, but  
10 I would make a decision who the decision maker would be  
11 on the case.

12 Q And in -- in context, what do you mean by you  
13 would make a decision on who the decision maker would  
14 be?

15 A Who would review the facts of the case and  
16 present it at the equity panel.

17 Q As a general matter in the Sheriff's  
18 Department, is it the subject supervisor that makes the  
19 decision whether to concur with the panel?

20 A Yes. Generally.

21 Q Let me just back up for a second.

22 My understanding -- correct me if I'm wrong --  
23 is the County Equity Oversight Panel, among other  
24 things, will issue recommendations for discipline or  
25 something else to the Sheriff's Department.

LECRIVAIN, LAURA

Page 32

1 Is that your understanding?

2 MR. TOKORO: Objection; vague and ambiguous as  
3 to what you mean by recommending discipline or something  
4 else.

5 You can answer, if understand.

6 THE DEPONENT: Generally, the equity panel  
7 makes a recommendation on discipline and discipline  
8 only.

9 BY MR. DiBONA:

10 Q And excuse me. Is it -- and the Sheriff's  
11 Department can -- can concur or disagree with the  
12 panel's decision; is that your understanding?

13 A Yes.

14 Q And as -- and as a general matter -- sorry --  
15 when I say the subject of the investigation, is that,  
16 for lack of a better term, the individual who was  
17 accused of wrongdoing in the context of the equity  
18 panel?

19 A Yes. The subject is the individual who there's  
20 an allegation against, yes.

21 Q And as a general matter, the Sheriff's  
22 Department, the person who makes the decision whether to  
23 concur or reject the panel's recommendation is the  
24 individual supervisor; correct?

25 A Generally.



LECRIVAIN, LAURA

Page 50

1 A Yes, that's correct.

2 Q Do you remember anything that was said during  
3 the actual hearing?

4 A No, I don't.

5 Q And do you remember what, if any,  
6 recommendations the CEOP gave?

7 A Yes.

8 Q What did they recommend?

9 A Their recommendation was the do not hire at the  
10 top of the file.

11 Q And did they recommend anything about any  
12 charges?

13 MR. TOKORO: Objection; vague and ambiguous as  
14 to what you mean by "charges."

15 THE DEPONENT: I -- I don't understand the  
16 question.

17 BY MR. DiBONA:

18 Q Let me ask it this way. Did the CEOP state why  
19 they believed there should be a do not hire notation  
20 placed top of file?

21 A Yes.

22 Q What was their reasons, to your understanding?

23 A They deemed the allegations in the case to be  
24 founded.

25 Q What's your understanding of what those

LECRIVAIN, LAURA

Page 51

1 allegations were?

2 A The allegations involved policy of equality  
3 violations.

4 Q And did you concur with that recommendation?

5 A Yes, I did.

6 Q And why did you concur with the recommendation?

7 A I concurred because the allegations were in  
8 fact founded based on the investigation, and the fact  
9 that Mr. Villanueva was no longer an employee, so there  
10 was no other form of discipline. There was no  
11 discipline. And the top of file is not considered  
12 discipline. It's a flag in the file.

13 Q Any other reason you concurred other than that?

14 A No, sir.

15 MR. DiBONA: All right. I'm going to switch  
16 subjects. Is now a good time we can take a five-minute  
17 break?

18 MR. TOKORO: Sounds good.

19 (Recess was taken)

20 BY MR. DiBONA:

21 Q Chief Lecrivain, do you understand you're still  
22 under oath?

23 A Yes.

24 Q Is there any reason you can't continue to give  
25 your best testimony?

LECRIVAIN, LAURA

Page 138

1 If you can't hear me at any point in time,  
2 Cila, just let me know.

3

4 CROSS EXAMINATION

5 BY MR. TOKORO:

6 Q Chief Lecrivain, you were asked a number of  
7 questions by Mr. DiBona, and I want to get to the heart  
8 of the matter.

9 Did Sheriff Luna have any involvement in your  
10 decision to concur with the CEOP's recommendations with  
11 respect to Mr. Villanueva?

12 A No.

13 Q Did Sheriff Luna attend the CEOP hearing at  
14 which those recommendations were made?

15 A No.

16 Q Did Sheriff Luna communicate with you or direct  
17 you in any way regarding your concurrence with the  
18 CEOP's recommendations?

19 A No.

20 Q Did anyone from the board of supervisors,  
21 specifically a board supervisor, attend the CEOP hearing  
22 on October 17 of 2023?

23 A No.

24 Q Did you communicate with any of the board of  
25 supervisors regarding your concurrence in the CEOP's

LECRIVAIN, LAURA

Page 139

1 recommendations?

2 A No.

3 Q Did any of the board of supervisors direct you  
4 on your decision to concur with the CEOP's  
5 recommendations?

6 A No.

7 Q Have you ever spoken with Supervisor Solis  
8 about Mr. Villanueva?

9 A No.

10 Q Have you ever spoken with Supervisor Hahn about  
11 Mr. Villanueva?

12 A No.

13 Q Have you ever spoken to any member of the board  
14 of supervisors about Mr. Villanueva?

15 A No.

16 Q Have you ever spoken to any member of the board  
17 of supervisors about the Huntsman investigation into  
18 Mr. Villanueva?

19 A No.

20 Q Have you ever spoken to any of the board of  
21 supervisors regarding the Lim investigation?

22 A No.

23 Q Now, Mr. DiBona asked you about a number of  
24 ballot measures. And I want to go back to that, because  
25 he didn't ask you the most important questions.

LECRIVAIN, LAURA

Page 140

1 With respect to Measure A, did Measure A have  
2 anything to do with your decision to concur in the  
3 CEOP's recommendations?

4 MR. DiBONA: Objection to form.

5 THE DEPONENT: No, it did not.

6 BY MR. TOKORO:

7 Q Did Mr. Villanueva's position on Measure A have  
8 anything to do with your concurrence in the CEOP's  
9 recommendations?

10 MR. DiBONA: Objection; form.

11 THE DEPONENT: No, it did not.

12 BY MR. TOKORO:

13 Q Did Measure J have anything to do with your  
14 decision at the October 17, 2023 CEOP hearing?

15 MR. DiBONA: Objection; form.

16 THE DEPONENT: No, it did not.

17 BY MR. TOKORO:

18 Q Did Mr. Villanueva's position or opposition to  
19 Measure J have anything to do with your decision to  
20 concur in the CEOP's recommendations?

21 MR. DiBONA: Objection; form.

22 THE DEPONENT: No, it did not.

23 BY MR. TOKORO:

24 Q Did Measure R have anything to do with your  
25 decision at the October 17, 2023 CEOP hearing?

LECRIVAIN, LAURA

Page 141

1 A No.

2 Q Did Mr. Villanueva's opposition to Measure R  
3 have anything to do with your decision at the  
4 October 17, 2023 CEOP hearing?

5 MR. DiBONA: Objection; form.

6 THE DEPONENT: No, it did not.

7 BY MR. TOKORO:

8 Q Now, Mr. DiBona also asked you about a Fulgent  
9 contract. Do you recall him asking you about that?

10 A Yes.

11 Q Did Fulgent have anything to do with your  
12 decision to concur with the CEOP's recommendations  
13 regarding the allegations against Mr. Villanueva?

14 MR. DiBONA: Objection; form.

15 THE DEPONENT: No, it did not.

16 BY MR. TOKORO:

17 Q Did Mr. Villanueva's opposition to the Fulgent  
18 contract with the county have anything to do with your  
19 decision on October 17 of 2023?

20 MR. DiBONA: Objection; form.

21 THE DEPONENT: No, it did not.

22 BY MR. TOKORO:

23 Q Mr. DiBona also asked you about  
24 Mr. Villanueva's refusal to enforce the vaccine mandate  
25 in connection with department personnel.

LECRIVAIN, LAURA

Page 142

1 Did that -- did the COVID vaccine mandate  
2 implemented by the county have anything to do with your  
3 decision at the October 17, 2023 CEOP hearing?

4 MR. DiBONA: Objection; form.

5 THE DEPONENT: No, it did not.

6 BY MR. TOKORO:

7 Q Did Mr. Villanueva's refusal to enforce the  
8 county's COVID vaccine mandate have anything to do with  
9 your decision at the October 17, 2023 CEOP hearing?

10 MR. DiBONA: Objection; form.

11 THE DEPONENT: No.

12 BY MR. TOKORO:

13 Q Now, Mr. DiBona also asked you whether you were  
14 aware that at the time of the CEOP hearing  
15 Mr. Villanueva was also running for a board of  
16 supervisors spot; do you recall that?

17 A Yes.

18 Q And I believe your testimony was you were not  
19 aware of that; is that correct?

20 A Yes.

21 MR. DiBONA: Objection; form.

22 BY MR. TOKORO:

23 Q Did Mr. Villanueva running for the board of  
24 supervisor have anything to do with your decision at the  
25 October 17, 2023 CEOP hearing?

LECRIVAIN, LAURA

Page 143

1 A No, it did not.

2 Q Was your decision to concur in the CEOP's  
3 recommendations retaliation for Mr. Villanueva's public  
4 statements in any way?

5 A No.

6 Q Was your decision to concur in the CEOP's  
7 recommendations an attempt by you to hinder  
8 Mr. Villanueva's prospects while running for the board  
9 of supervisors?

10 MR. DiBONA: Objection; form.

11 THE DEPONENT: No. The answer is no.

12 MR. TOKORO: That's all I've got.

13 MR. DiBONA: Just a couple of follow-ups.

14

15 FURTHER EXAMINATION

16 BY MR. DiBONA:

17 Q Chief Lecrivain, do you agree that finding a  
18 former employee -- sorry. Strike that.

19 Do you agree that finding a former sheriff  
20 having charges founded related to policy of equality  
21 violations is a serious matter?

22 MR. TOKORO: Objection; vague and ambiguous as  
23 to what you mean by "charges," because I believe it's  
24 been repeatedly testified they're allegations. But,  
25 also, vague and ambiguous as to what you mean by



LECRIVAIN, LAURA

Page 147

1 services or products to any party's attorney or third  
2 party who is financing all or part of the action without  
3 first offering same to all parties or their attorneys  
4 attending the deposition and making same available at  
5 the same time to all parties or their attorneys. (Civ.  
6 Proc. 2025.320(b))

7 I shall not provide any service or product  
8 consisting of the deposition officer's notations or  
9 Comments regarding the demeanor of any witness,  
10 attorney, or party present at the deposition to any  
11 party or any party's attorney or third party who is  
12 financing all or part of the action, nor shall I collect  
13 any personal identifying information about the witness  
14 as a service or product to be provided to any party or  
15 third party who is financing all or part of the action.  
16 (Civ. Proc. 2025.320(c))

17

18 Dated: March 31, 2025

19

20

21

*Cila Meyer*

22

23

24

25

# EXHIBIT 13

**CERTIFIED COPY**

1605 W. Olympic Blvd., Suite 800 Los Angeles, CA 90015

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ALEX VILLANUEVA vs COUNTY OF LOS ANGELES

KYLA COATES

March 26, 2025

Lisa Lemus, CSR No. 11484, Job No. 6902

1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION  
3

4 ALEX VILLANUEVA, )  
5 Plaintiff, )  
6 ) Case No:  
7 vs. ) 2:24-cv-04979 SVW(JCx)  
8 )  
9 COUNTY OF LOS ANGELES, COUNTY OF )  
10 LOS ANGELES SHERIFF'S DEPARTMENT,) )  
11 LOS ANGELES COUNTY BOARD OF )  
12 SUPERVISORS, COUNTY EQUITY )  
13 OVERSIGHT PANEL, LOS ANGELES )  
14 COUNTY OFFICE OF INSPECTOR )  
15 GENERAL, CONSTANCE KOMOROSKI, )  
16 MERCEDES CRUZ, ROBERTA YANG, )  
17 LAURA LECRIVAIN, SERGIO V. )  
18 ESCOBEDO, RON KOPPERUD, ROBERT G.)  
19 LUNA, MAX-GUSTAF HUNTSMAN, )  
20 ESTHER LIM, and DOES 1 TO 100, )  
21 inclusive, )  
22 )  
23 Defendants. )  
24 \_\_\_\_\_)

18 REMOTE VIDEOCONFERENCE DEPOSITION OF  
19 KYLA COATES  
20 WEDNESDAY, MARCH 26, 2025  
21  
22  
23

24 Reported by: Lisa Lemus, CSR No. 11484  
25

1 Remote Videoconference Deposition of  
2 KYLA COATES, taken on behalf of Plaintiff via Zoom  
3 appearance at, Los Angeles, California, at 10:02 a.m.,  
4 Wednesday, March 26, 2025, before LISA LEMUS, CSR No.  
5 11484, a Certified Shorthand Reporters within and for the  
6 County of Ventura, State of California, pursuant to  
7 Notice.

8

9 \* \* \* \* \*

10

11 APPEARANCES:

12 For the Plaintiff:

13 SHEGERIAN & ASSOCIATES, INC.  
14 BY: ALEX DIBONA  
15 Attorney at Law  
11520 San Vincente Boulevard  
Los Angeles, California 90049

16

For the Defendants:

17

18 MILLER BARONDESS, LLP  
BY: JASON H. TOKORO  
19 Attorney at Law  
2121 Avenue of the Stars  
Suite 2600  
20 Los Angeles, California 90067

21

22

23

24

25

1 up.

2 Was there a particular purpose to each meeting or  
3 was it just a regularly scheduled check-in of some type?

4 A. Regularly scheduled check-ins.

5 Q. Did Sheriff Villanueva say anything during those  
6 Zoom meetings that you found offensive or inappropriate?

7 A. Yes.

8 Q. What -- what did he say during those meetings  
9 that you found offensive or inappropriate?

10 A. I remember one meeting he pointed to me and he  
11 said that I looked like a woke 20-something year old  
12 who's never had a job before, who worshipped at the alter  
13 of wokeness.

14 Q. I apologize for asking this, but what is your  
15 date of birth?

16 A. June 25, 1989. So I was not in my twenties at  
17 the time.

18 Q. Did Sheriff Villanueva say -- sorry. Do you  
19 recall the context in which he made that remark?

20 A. No.

21 Q. And did Sheriff Villanueva explain any of those  
22 terms?

23 A. No.

24 Q. Do you have an understanding of what Sheriff  
25 Villanueva -- sorry. Have you ever heard Sheriff

1 Villanueva say what he means when he uses the term  
2 "woke"?

3 A. No.

4 Q. And -- and I take it from your response, Sheriff  
5 Villanueva didn't say to you what he meant during that  
6 conversation; is that right?

7 A. That is correct.

8 Q. How many times did -- sorry, just to be clear,  
9 the words were something to the effect of you looked like  
10 a woke 20-something that worshipped in the alter -- at  
11 the alter of wokeness. Do I have that right?

12 A. Yes.

13 Q. How many times did he make such a remark?

14 A. Directly to me or in public?

15 Q. Sorry, fair question. How many times did Sheriff  
16 Villanueva say that directly to you?

17 A. I think just that one time.

18 Q. And Ms. Hahn, she was on the Zoom meeting so  
19 presumably she heard it; is that your understanding?

20 A. Yes.

21 Q. Did you and Ms. Hahn discuss that comment at all  
22 afterwards?

23 A. I don't remember.

24 Q. Did you memorialize that remark when it happened  
25 in any way, like sending an email, writing a personal

1 note, anything like that?

2 A. No.

3 Q. Other than -- did you report that remark to  
4 anyone in the -- in the county outside of Ms. Hahn?

5 A. No.

6 Q. And is there any reason why not?

7 A. No.

8 Q. Other than the remark we just mentioned, did  
9 Sheriff Villanueva say anything else in these Zoom  
10 meetings that you found inappropriate or offensive?

11 A. Not that I remember.

12 Q. And was there ever a time when you and Sheriff  
13 Villanueva interacted directly in person that you recall?

14 A. Yes.

15 Q. And how many times did that happen?

16 A. Multiple times. I would say definitely a  
17 handful.

18 Q. And were -- were those interactions, were they at  
19 board of supervisors' public meetings?

20 A. Sometimes.

21 Q. Outside of the -- outside of the board of  
22 supervisors public meetings, how many times do you think  
23 you had direct interaction with Sheriff Villanueva?

24 A. We would interact at press conferences, so a  
25 handful of times outside of the supervisors meetings.



1 A. No.

2 Q. Did she ever say that she would make any attempts  
3 to contact the sheriff herself?

4 A. No.

5 Q. And did she ever say that she would in any way  
6 reach out to anyone in the Sheriff's Department about the  
7 Facebook lives?

8 A. No.

9 Q. Do you have -- do you have a recollection of the  
10 name of the individual that sent you that email?

11 A. What email?

12 Q. Sorry. Fair question. Let me go back. The  
13 email that was requesting an interview for you with  
14 respect to Ester Lim's complaint, do you remember who  
15 sent you that email?

16 A. I think her name was Christina Diaz Hernandez, if  
17 I'm remembering correctly. I could be getting something  
18 wrong there, it could be Christine not Christina. I  
19 would have to go back and look but they were in the  
20 documents that I had submitted.

21 Q. All right. Does Christine Diaz Herrera sound --

22 A. Yeah.

23 Q. -- right. And prior to this email, had you ever  
24 had any interaction with Christine Diaz Herrera?

25 A. No.

1 Q. And did Ms. Diaz Herrera, did she tell you that  
2 she was -- excuse me, an attorney with the law firm by  
3 the name of Sanders Roberts?

4 A. I think so.

5 Q. Prior to the email with Ms. Diaz Herrera, had you  
6 ever interacted with anyone from Sanders Roberts before?

7 A. No.

8 Q. And prior to that email, did you even know of the  
9 existence of the law firm Sanders Roberts?

10 A. No.

11 Q. So to your understanding, had the Sanders  
12 Roberts, had they done any other work on behalf of the  
13 county?

14 A. Not that I know of.

15 Q. Did Ms. Diaz Herrera tell you who she was doing  
16 the investigation on behalf of?

17 A. I think so.

18 Q. And who did she tell you she was doing it on  
19 behalf of?

20 A. I think she said Esther Lim.

21 Q. And did she say that she was doing the  
22 investigation on behalf of the sheriff's department or  
23 the County of Los Angeles, or did she not make any  
24 distinction?

25 A. I don't remember.

1 Q. And were you interviewed?

2 A. Yes.

3 Q. And how did that interview take place?

4 A. I remember that she emailed me requesting an  
5 interview. I emailed her back and said I was about to be  
6 in the car driving home, could I give her a call. And so  
7 she responded with her cell phone number, and I called  
8 her from my phone in the car while I was driving home.

9 Q. Do you recall how long the interview took place?

10 A. I don't.

11 Q. Do you recall one way or the other -- sorry. Do  
12 you know one way or the other if the interview was  
13 recorded?

14 A. I don't think it was recorded. I don't remember  
15 her saying this is going to be recorded.

16 Q. That was going to be my next question, but just  
17 so the record is clear, did Ms. Diaz Herrera ask you if  
18 she could record the conversation?

19 A. I don't think so.

20 Q. Did you take any -- sorry. Did you summarize  
21 that interview in any way?

22 A. What do you mean?

23 Q. For example, after the interview, did you send  
24 the follow-up email to Ms. Diaz Herrera saying words to  
25 the effect of just to summarize what we -- what I said in

1 Q. And for lack of a better word, colloquially,  
2 meaning they made you upset since you were weren't  
3 clinically diagnosed?

4 A. Exactly.

5 Q. Can you explain how it was that they made you  
6 upset?

7 MR. TOKORO: Just -- I'm interposing an objection  
8 to the last question that it's vague and ambiguous.

9 But you can answer the next question.

10 THE WITNESS: Can you repeat that?

11 BY MR. DiBONA:

12 Q. Yeah, might be obvious from the context we're  
13 talking about, but just can you describe how it was that  
14 listening to Sheriff Villanueva's Facebook live sessions  
15 made you upset?

16 A. Yes. The former sheriff would say a lot of lies  
17 on his Facebook live streams, and he would come after my  
18 boss, our bosses, and the justice deputies as a whole.  
19 And sometimes he would specifically come after Esther  
20 Lim, as an individual justice deputy, and it was  
21 upsetting to me. And I decided that the amount of upset  
22 that it caused me did not mean -- let me rephrase that.

23 It made me upset and it didn't positively  
24 contribute to my job and so I stopped watching them. And  
25 instead if there was a Facebook live that specifically

1 talked about the justice deputies or Supervisor Hahn,  
2 Liz, the communications director would forward me the  
3 transcript so I could read it and then I could know how  
4 to respond or talk to Supervisor Hahn about it.

5 Q. And excuse me, I think you made a reference to  
6 lies that Mr. -- or that then Sheriff Villanueva was  
7 saying, what were the lies you heard him say?

8 A. So many things. For example, he once said that  
9 the supervisors only hire women and that all of their  
10 deputies are women, which is not true. John Matthews was  
11 Supervisor Mitchell's justice deputy at the time, he's a  
12 man. He also said we were all in our twenties and had  
13 never had a job in our lives, which was not true. None  
14 of us were in our twenties. All of us had prior careers.  
15 All of us had other degrees as well.

16 He would say things about the supervisors. He  
17 would say that they were defunding the sheriff's  
18 department. He would say they didn't support the  
19 sheriff's department, that they didn't support law  
20 enforcement. And he would tell explicit lies many times  
21 on his Facebook lives.

22 Q. When, to your understanding, was Holly Mitchell  
23 elected to the board of supervisors?

24 A. Hold on, I can figure this out. She is on the  
25 same term 2022 I want to say. Yes, she just got

1 re-elected, so 2022 she was first elected.

2 Q. Is it your understanding, did Holly Mitchell, did  
3 she -- did she represent the same district that Mark  
4 Ridley-Thomas used to represent?

5 A. That is correct.

6 Q. And what district is that? Do you know off the  
7 top of your head?

8 A. Yeah, the second district.

9 Q. And so from your statement, Ms. Mitchell would  
10 have had justice deputies on a staff after 2022; is that  
11 correct?

12 A. Yes.

13 Q. And John -- you said the name of the male justice  
14 deputy is John Matthews; is that correct?

15 A. At the time, yes. Not anymore.

16 Q. Apologies. I'll rephrase it just so we have a  
17 clear record. At the time Ms. -- I'm sorry. When you  
18 say "at the time," what time are you referring to so --  
19 so I know?

20 A. When he was doing these lives, so 2022.

21 Q. Got it. So in 2022, your -- Holly Mitchell had a  
22 male justice deputy named John Matthews, correct?

23 A. Correct.

24 Q. And is John Matthews still a justice deputy?

25 MR. TOKORO: Alex, I'm gonna step in here and

1 just make sure that I put it on the record -- and you're  
2 free to do whatever you want with it, but I just want to  
3 point out that I believe Holly Mitchell was elected in  
4 2020 and not 2022. So again, do what you want with it,  
5 but I believe that if she was re-elected in -- recently  
6 she would have been first elected in 2020.

7 THE WITNESS: You're correct. Thank you. She  
8 was elected in 2020.

9 So he would have been her -- John Matthews would  
10 have been her justice deputy from 2021 to very recently.

11 BY MR. DiBONA:

12 Q. And does Mr. Matthews still work for the County  
13 of Los Angeles to your understanding?

14 A. Yes.

15 Q. Where does he work now?

16 A. The public defender's office.

17 Q. And do you have an understanding of what role he  
18 has at the public defender's office?

19 A. I think he's a chief deputy, but I'm not sure.

20 Q. Other than -- in -- just in the year 2022,  
21 separate and apart from when Ms. Mitchell was elected,  
22 other than John Matthews, are you aware of any other male  
23 justice deputies?

24 A. Yes. Chris Ah San is the associate justice  
25 deputy and he was the associate justice deputy under

1 supervisor Ridley-Thomas, so he has been there for many  
2 years. He was there before I started working for  
3 Supervisor Hahn and he is still there today.

4 Q. And in the year 2022, how many justice deputies  
5 were there?

6 A. There were five senior justice deputies, and I  
7 don't remember how many associate justice deputies.

8 Q. And of the five senior justice deputies and  
9 the -- however many associate deputies, is it your  
10 recollection there were two men?

11 A. In 2022?

12 Q. Yes, sorry.

13 A. Yes.

14 Q. And do you know one way or the other if John  
15 Matthews ever interacted with Sheriff Villanueva?

16 A. Yes, he did.

17 Q. And how do you know that?

18 A. Because we all did as part of our job.

19 Q. And did you -- were you ever in a room with  
20 Mr. Matthews, Mr. -- then Sheriff Villanueva and  
21 yourself?

22 A. Probably only in the scope of a board meeting or  
23 a press conference.

24 Q. And do you know if Mr. Ah Sof -- I'm sorry, the  
25 other male justice deputy's name was Chris Ah Sof; is



1 that right or am I getting that wrong?

2 A. It's Ah San it's A-h space S-a-n.

3 Q. Mr. Ah San, do you know one way or another if  
4 Sheriff Villanueva interacted with him at all in 2022?

5 A. I don't know about that.

6 Q. Did Sheriff Villanueva ever mention you by name,  
7 like did he ever say Kyla Coates or anything like that in  
8 any of his Facebook lives?

9 MR. TOKORO: Objection. Just making sure the  
10 record is clear that she answered this question earlier  
11 about the one-on-one conversation on Zoom, but if you're  
12 limiting it to Facebook live, you can answer.

13 THE WITNESS: Not -- no. Not that I recall.

14 BY MR. DiBONA:

15 Q. And did you ever hear Sheriff Villanueva say the  
16 justice deputies are all women and unqualified?

17 A. I don't think I heard those exact words, but I  
18 heard that sentence. Yes.

19 Q. And what sentence -- and how did -- it's your  
20 recollection, how did Sheriff Villanueva express that  
21 sentiment?

22 A. He would say that we were all in our twenties,  
23 that we had never had real jobs, that we were straight  
24 out of college and that we were the ones writing these  
25 board motions that couldn't stand up to legal muster,

1 that were dumb policy, and he would also say in the same  
2 sentence that we were all women.

3 Q. And do you see still on Exhibit 2, there's a  
4 reference here to supervisor Mitchell having two male  
5 justice deputies?

6 A. Yes.

7 Q. Those -- I think we covered it, those two male  
8 deputies would be Chris Ah Sof -- I'm getting that name  
9 wrong, I'm sorry, and John Matthews; is that right?

10 A. Correct.

11 MR. TOKORO: Alex, it's an N at the -- it's not a  
12 P it's Ah San. N as in Nancy.

13 THE WITNESS: Correct.

14 BY MR. DiBONA:

15 Q. Do you believe that Sheriff Villanueva was  
16 especially awful to Supervisor Holly Mitchell?

17 A. I believe he was especially awful to both  
18 Supervisor Holly Mitchell and Supervisor Hilda Solis.

19 Q. And just to break it up, how was Sheriff  
20 Villanueva especially awful to Supervisor Mitchell?

21 A. He would call her out by name more than the other  
22 supervisors when he was on his Facebook lives, or at  
23 press conferences or in interviews in the scope of his  
24 professional capacity, as someone who was acting against  
25 public safety, in his words, in the sheriff's words.

1 Q. Any other way that you believe Sheriff Villanueva  
2 was acting especially awful to Supervisor Mitchell, other  
3 than in your words, acting contrary to public safety?

4 MR. TOKORO: Misstates her prior testimony.

5 But you can clarify and answer.

6 THE WITNESS: Yeah, to clarify, he would say that  
7 Supervisor Mitchell didn't care about public safety,  
8 which is not what I believe to be true, and not what  
9 Supervisor Mitchell would say. And he would also accuse  
10 her of trying to defund the sheriff's department.

11 BY MR. DiBONA:

12 Q. And did Sheriff Villanueva, to your memory, ever  
13 make a reference to Ms. Mitchell's race?

14 A. I do not recall.

15 Q. Did Sheriff Villanueva ever make a reference to  
16 Ms. Mitchell's gender?

17 A. I do not recall.

18 Q. And how do you believe that Sheriff Villanueva  
19 was especially awful to Hilda Solis?

20 A. Same thing is that he would explicitly call her  
21 out more than others and he would -- there was an LA  
22 Times article about him using a term to describe her that  
23 is derogatory. And he would talk about her more  
24 derogatorily than the other supervisors.

25 Q. And do you remember the -- what that derogatory

1 was indicted on federal criminal charges while he was  
2 still a member of the board of supervisors?

3 A. No, he wasn't a member of the board when he was  
4 indicted, right? He was on city council.

5 Q. Do you see here there's a reference to Sheriff  
6 Villanueva saying to you, I can tell from your age you're  
7 one of those people that hate the police and want to  
8 defund us?

9 A. Yes.

10 Q. And did Sheriff Villanueva say that to you?

11 A. Yes.

12 Q. And was that at a virtual meeting?

13 A. Yes.

14 Q. Did you and -- did you and Ms. Hahn discuss that  
15 after the meeting?

16 A. I think so.

17 Q. And do you remember what, if anything, she said?

18 A. No.

19 Q. And excuse me, did you document that comment in  
20 any way like through an email or anything like that?

21 A. No.

22 Q. And it says here your response is, That is not  
23 true. You don't know me or my personal background.

24 Is that how you responded?

25 A. I think so, yes.

1 Q. And did Sheriff Villanueva say anything else  
2 after that?

3 A. I can't remember.

4 Q. And can you recall, as you sit here today, if  
5 Supervisor Hahn responded?

6 A. I can't remember.

7 Q. You see here there's a reference to Sheriff  
8 Villanueva insulting Supervisor Hahn to her face?

9 A. Yes.

10 Q. How did Sheriff Villanueva insult Supervisor Hahn  
11 to her face?

12 A. I don't remember what this is specifically  
13 referring to, but he would insult everyone he talked to  
14 and would constantly insult her and me, and so this  
15 doesn't surprise me. But I don't remember what this is  
16 referring to.

17 Q. Do you have a recollection of saying to Ms. Diaz  
18 Herrera that Supervisor Hahn was insulted by Sheriff  
19 Villanueva directly to her face?

20 A. I don't remember saying it, but it sounds like  
21 something I would say since he would insult her to her  
22 face frequently.

23 MR. DiBONA: We've been going actually more than  
24 an hour, is now a good time for a five minute break?

25 THE WITNESS: Sure.

1 MR. DiBONA: Thank you.

2

3 (Off the record at 11:15 a.m.)

4 (On the record at 11:23 a.m.)

5

6 BY MR. DiBONA:

7 Q. Ms. Coates, do you understand you're still under  
8 oath?

9 A. Yes.

10 Q. Is there any reason you can't continue to give  
11 your best testimony?

12 A. No.

13 Q. I think the last thing I asked you, it's fair to  
14 say you don't remember what the insult was that Sheriff  
15 Villanueva said to Supervisor Hahn's face; is that fair?

16 A. Yes.

17 Q. And did supervisor Kuehl ever call out Sheriff  
18 Villanueva on any of his behavior in general, to your  
19 recollection?

20 A. Yes.

21 Q. And is that something you witnessed or is that  
22 something you heard about?

23 A. I would witness it at board meetings.

24 Q. And how would she do that, to your understanding?

25 A. Yeah, she would counter and question some of the

1 things he would say publically and call him out for  
2 lying.

3 Q. Any other way that she would call him out other  
4 than that?

5 A. I can't remember other specific ways.

6 Q. Did Sheriff Villanueva ever say to you directly  
7 that justice deputies were all women?

8 A. Not directly to me during a meeting. He said it  
9 on his lives that I watched or I heard about.

10 Q. Did Sheriff Villanueva ever directly say to you  
11 anything about the board of supervisors being all women?

12 A. Not to me during a meeting but he said it during  
13 his press conferences that I watched and his lives and on  
14 a radio interview, I believe, that I listened to.

15 Q. Did you ever directly ask Sheriff Villanueva what  
16 are you implying even if you are all women, or words to  
17 that effect?

18 A. No.

19 Q. And did you -- for whatever reason, did you ever  
20 tell Ms. Diaz Herrera that you had asked Sheriff  
21 Villanueva directly what are you implying by saying we're  
22 all women?

23 A. I don't think so. I don't remember.

24 Q. Do you ever recall -- excuse me. Do you ever  
25 recall Sheriff Villanueva saying anything negative

1 directly to Supervisor Kuehl?

2 A. He said negative things about Supervisor Kuehl  
3 frequently and about all the supervisors frequently.

4 Q. Did you -- did you ever hear Sheriff Villanueva  
5 say to Supervisor Kuehl, I'll stop saying bad things  
6 about you publically if you end the hiring freeze, I'll  
7 stop being mean to you?

8 A. I don't remember that but the hiring freeze is --

9 Q. Sorry, go ahead. No, go ahead. I just didn't  
10 hear -- hear your answer. You said I don't remember that  
11 but the hiring freeze, then I didn't hear. Did you say  
12 anything after the hiring freeze?

13 A. That implies that the supervisors had implemented  
14 a hiring freeze on his department. In fact, it was a  
15 county wide hiring freeze because of the pandemic and it  
16 was not a hard hiring freeze. All department heads had  
17 to do was go to the CEO's office to request the authority  
18 to hire. And in terms of the sheriff's department, the  
19 CEO granted that authority multiple times, and the  
20 sheriff at the time continued to hire during the  
21 so-called hiring freeze.

22 Q. Was there --

23 A. The implication of that statement I believe is  
24 false.

25 Q. Okay. And just to be clear, regardless of



1 whether it's true or false, do you -- did you ever hear  
2 Sheriff Villanueva say to Supervisor Kuehl, if you end  
3 the hiring freeze I'll stop being mean to you?

4 A. I can't remember.

5 Q. And -- excuse me. Do you recall there was a  
6 period of time where the hiring freeze, hard or  
7 otherwise, was actually lifted county wise --  
8 county-wide, excuse me?

9 A. At one point it was lifted because we are not  
10 under a hiring freeze now, so I don't remember when that  
11 was.

12 Q. Do you recall initially when it was lifted  
13 county-wide, the hiring freeze for the Sheriff's  
14 Department remained in place?

15 A. I don't remember.

16 Q. Was there a period of time, to your recollection,  
17 that the Sheriff's Department had to go to the county CEO  
18 specifically for permission to hire when other department  
19 heads wouldn't have to do that?

20 MR. TOKORO: I'm just gonna make the objection it  
21 lacks foundation. Calls for speculation. Also gonna  
22 make a relevance objection, and I'm also gonna make the  
23 objection that it assumes facts not in evidence. There's  
24 been nothing to establish this claim that Mr. DiBona is  
25 making.

1 But you can otherwise answer if you know.

2 THE WITNESS: Yeah, I don't remember. I don't  
3 work for the CEO's office, so I haven't been in those  
4 conversations.

5 BY MR. DiBONA:

6 Q. And do you remember Sheriff Villanueva ever  
7 saying to Supervisor Kuehl, I'll stop saying bad things  
8 about you publically if you end the hiring freeze?

9 MR. TOKORO: The question's been asked and  
10 answered a couple of times now.

11 But you can answer it again.

12 THE WITNESS: I don't remember -- I don't  
13 remember hearing that.

14 BY MR. DiBONA:

15 Q. Do you -- did you ever hear Sheriff Villanueva  
16 use the term la malinche to refer to Hilda Solis?

17 A. Yes.

18 Q. I think earlier you said that there was a term  
19 began with M but you don't speak Spanish. Do you  
20 remember it being la malinche?

21 A. Yes. Now that you say it, that sounds familiar.

22 Q. And since you don't speak Spanish I won't ask you  
23 for the literal definition, but do you have any  
24 understanding of what la malinche refers to separate and  
25 apart from you don't speak Spanish?

1 A. Yes.

2 Q. What is your understanding of what it refers to?

3 A. My understanding is that it is a negative term  
4 for a woman, and I know that there's a historical context  
5 to it, but I cannot quite remember it right now.

6 Q. And did you ever read a transcript where Sheriff  
7 Villanueva said he would -- he should take the board of  
8 supervisors out to a shed and hit them or words to that  
9 effect?

10 A. Yes. I remember that.

11 Q. And do you remember, was there any context to him  
12 saying that?

13 MR. TOKORO: Objection. Vague and ambiguous as  
14 to what you mean by "context" as to that.

15 But you can answer if you understand.

16 THE WITNESS: There's context to every statement.  
17 I'm sure there was context to that, but I don't remember  
18 what it was.

19 BY MR. DiBONA:

20 Q. Do you, yourself have an account on what's now  
21 known as X, what was formerly known as Twitter?

22 A. Yes.

23 Q. And do you follow Esther Lim?

24 A. No.

25 Q. And have you ever followed Esther Lim, on

1 A. No.

2 Q. Does the board of supervisors have any role in  
3 the LA County sheriff's department budget?

4 A. Yes.

5 Q. What is the board of supervisors' role in the  
6 budget to your understanding?

7 A. They vote to approve the budget.

8 Q. As you sit here right now, do you believe any  
9 part of your testimony needs to be changed?

10 A. No.

11 MR. DiBONA: I don't have any further questions.  
12 Do you counsel?

13 MR. TOKORO: I do.

14

15 EXAMINATION

16

17 BY MR. TOKORO:

18 Q. Ms. Coates, Mr. DiBona asked you a number of  
19 questions about measure A; do you recall that?

20 A. Yes.

21 Q. Now, did measure A have anything to do with the  
22 interview that you gave to Ms. Diaz Herrera?

23 MR. DiBONA: Objection. Form.

24 BY MR. TOKORO:

25 Q. You can answer.

1 A. No.

2 Q. Did Mr. Villanueva's opposition to measure A have  
3 anything to do with your interview that you gave to  
4 Ms. Diaz Herrera?

5 MR. DiBONA: Objection. Form.

6 And just to let you know, Ms. Coates, I'm  
7 objecting for the record. You may answer your counsel's  
8 questions. Just to avoid having to keep saying that.

9 THE WITNESS: Okay. Thank you.

10 The answer is no.

11 BY MR. TOKORO:

12 Q. When you gave your interview to Ms. Diaz Herrera,  
13 was that to retaliate against Mr. Villanueva or his  
14 opposition to measure A?

15 MR. DiBONA: Objection. Form.

16 THE WITNESS: No.

17 BY MR. TOKORO:

18 Q. You also were asked about measure J. Did measure  
19 J have anything to do with the interview you gave to  
20 Ms. Diaz Herrera?

21 MR. DiBONA: Objection. Form.

22 THE WITNESS: No.

23 BY MR. TOKORO:

24 Q. Did Mr. Villanueva's opposition to measure J have  
25 anything to do with the interview you gave to Ms. Diaz

1 Herrera?

2 MR. DiBONA: Objection. Form.

3 THE WITNESS: No.

4 BY MR. TOKORO:

5 Q. Did you say the things you said in your interview

6 with Ms. Diaz Herrera to retaliate against

7 Mr. Villanueva's opposition to measure J?

8 A. No.

9 Q. You were also asked about measure R. Did measure

10 R have anything to do with your interview with Ms. Diaz

11 Herrera?

12 MR. DiBONA: Objection. Form.

13 THE WITNESS: No.

14 BY MR. TOKORO:

15 Q. Did Mr. Villanueva's opposition to measure R have

16 anything to do with the interview you gave to Ms. Diaz

17 Herrera?

18 A. No.

19 Q. Was anything you said during your interview with

20 Ms. Diaz Herrera in retaliation for Mr. Villanueva

21 opposing measure R?

22 A. No.

23 Q. Did the county's COVID vaccine mandate have

24 anything to do with the interview you gave to Ms. Diaz

25 Herrera?

1 MR. DiBONA: Objection. Form.

2 THE WITNESS: No.

3 BY MR. TOKORO:

4 Q. Did Mr. Villanueva's refusal to enforce the  
5 county's COVID vaccine mandate have anything to do with  
6 the interview you gave Ms. Diaz Herrera?

7 MR. DiBONA: Objection. Form.

8 THE WITNESS: No.

9 BY MR. TOKORO:

10 Q. Did you give the interview to Ms. Diaz Herrera  
11 and say the things that you said during that interview  
12 because you wanted to retaliate against Mr. Villanueva  
13 for his opposition to the county's COVID vaccine  
14 mandate?

15 A. No.

16 Q. Did the Fulgent contract have anything to do  
17 with the interview that you gave to Ms. Diaz Herrera?

18 MR. DiBONA: Objection. Form.

19 THE WITNESS: No.

20 BY MR. TOKORO:

21 Q. Did Mr. Villanueva's opposition to the Fulgent  
22 contract have anything to do with the interview you gave  
23 to Ms. Diaz Herrera?

24 MR. DiBONA: Objection. Form.

25 THE WITNESS: No.

1 BY MR. TOKORO:

2 Q. Did you say the things you said in the interview  
3 with Ms. Diaz Herrera to retaliate against Sheriff  
4 Villanueva for his opposition to the Fulgent contract?

5 A. No.

6 Q. Now, Mr. Villanueva has claimed in this case that  
7 certain people were involved in the investigation and  
8 eventual do not hire notation. And I only want to ask  
9 you questions about your personal experiences. So first  
10 I want to ask you, was Sheriff Luna involved in any way  
11 in your interview with Ms. Christine Diaz Herrera?

12 A. No.

13 Q. Did you ever have a communication with Sheriff  
14 Luna about Ester Lim's complaint?

15 A. No.

16 Q. Did you ever have a conversation with Sheriff  
17 Luna about Max Huntsman's complaint?

18 A. No.

19 Q. Have you ever had a conversation with Mr. Luna  
20 about the do not rehire notation placed on  
21 Mr. Villanueva's file?

22 A. No.

23 Q. Have you ever had a conversation with Sheriff  
24 Luna about this lawsuit?

25 A. No.



1 Q. Have you ever had a conversation with Sheriff  
2 Luna about the LA Times article?

3 A. No.

4 Q. Now, I want to ask you about the board of  
5 supervisors and I want to first ask you about the board  
6 generally. Did any of the members of the board of  
7 supervisors communicate with you about your interview  
8 with Ms. Diaz Herrera?

9 A. No.

10 Q. Did any of the board of supervisors direct you on  
11 how you should testify during your interview with  
12 Ms. Diaz Herrera?

13 A. No.

14 Q. Did Supervisor Solis have any communications with  
15 you about your interview with Ms. Diaz Herrera?

16 A. No.

17 Q. Did Supervisor Solis direct you on how to testify  
18 during your interview with Ms. Diaz Herrera?

19 A. No.

20 Q. What about Supervisor Hahn, did she have any  
21 communications with you about how to testify during your  
22 interview with Ms. Diaz Herrera?

23 A. No.

24 Q. Now, Mr. DiBona showed you the Sanders Roberts  
25 report as one of the exhibits today. Do you recall that?

1 A. Yes.

2 Q. And he showed you portions of the report that  
3 reflected a summary of your interview with Ms. Diaz  
4 Herrera; do you recall that?

5 A. Yes.

6 Q. Of the portions that Mr. DiBona showed you, do  
7 you believe that any part of it is inaccurate?

8 MR. DiBONA: Objection. Form.

9 THE WITNESS: No.

10 BY MR. TOKORO:

11 Q. Do you believe that the portions Mr. DiBona  
12 showed you accurately reflect the interview that you gave  
13 to Ms. Diaz Herrera?

14 MR. DiBONA: Objection. Form.

15 THE WITNESS: Yes.

16 BY MR. TOKORO:

17 Q. Do you believe those portions accurately reflect  
18 what you told her about your experiences with  
19 Mr. Villanueva?

20 A. Yes.

21 Q. Do you believe that those portions accurately  
22 reflect what you told Ms. Diaz Herrera what Villanueva  
23 said about the board of supervisors?

24 MR. DiBONA: Objection. Form.

25 THE WITNESS: Yes.

1 BY MR. TOKORO:

2 Q. Do you believe the portions that Mr. DiBona  
3 showed you accurately reflect what you told Ms. Diaz  
4 Herrera about what Mr. Villanueva said about the justice  
5 deputies?

6 A. Yes.

7 Q. Now, you testified earlier about Mr. Villanueva  
8 referring to the board of supervisors as all women. Do  
9 you recall that?

10 A. Yes.

11 Q. Now, when Mr. Villanueva made those comments, and  
12 I think you said repeatedly made those comments, did you  
13 believe that he was using that in a positive way?

14 MR. DiBONA: Objection. Form.

15 THE WITNESS: No.

16 BY MR. TOKORO:

17 Q. What was your understanding of what  
18 Mr. Villanueva was saying when he was referring to the  
19 board as being all women?

20 MR. DiBONA: Objection. Form.

21 THE WITNESS: He was saying them always in a  
22 negative light. He would say that they were all women in  
23 the same sentence that he then proceeded to insult them  
24 and imply that they were bad at their jobs, that they  
25 didn't like the police, and that they were inept. And so

COATES, KYLA

Page 105

1 STATE OF CALIFORNIA )  
2 ) ss.  
3 COUNTY OF LOS ANGELES )  
4

5 I, KYLA COATES, declare under penalty of  
6 perjury that the foregoing testimony is true and correct  
7 to the best of my knowledge and belief.

8 Dated this 1 day of April, 2025.

9

10

11

12

13

14

15

16

17

18

19

20

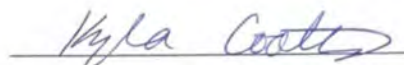
21

22

23

24

25



KYLA COATES

1 STATE OF CALIFORNIA )  
 )  
2 COUNTY OF VENTURA ) ss.

3

4 CERTIFICATE OF REPORTER

5

6 I, Lisa Lemus, CSR No. 11484, a Certified  
7 Shorthand Reporter, hereby certify that the witness in  
8 the foregoing remote videoconference deposition was by me  
9 duly sworn to tell the truth, the whole truth, and  
10 nothing but the truth in the within-entitled cause;

11 That said deposition was taken in shorthand  
12 by me, a disinterested person, at the time and place  
13 wherein stated, and that the testimony of the said  
14 witness was thereafter reduced to typewriting, by  
15 computer, under my direction and supervision;

16 I further certify that I am not of counsel  
17 or attorney for either or any of the parties to the said  
18 deposition, nor in any way interested in the event of  
19 this cause, and that I am not related to any of the  
20 parties hereto.

21

22 Dated this 1st day of April, 2025.

23

24 Lisa Lemus  
LISA LEMUS, CSR No. 11484  
25 Certified Shorthand Reporter

COATES, KYLA

Page 107

1 Errata Sheet  
2  
3 NAME OF CASE: ALEX VILLANUEVA vs COUNTY OF LOS ANGELES  
4 DATE OF DEPOSITION: 03/26/2025  
5 NAME OF WITNESS: Kyla Coates  
6 Reason Codes:  
7 1. To clarify the record.  
8 2. To conform to the facts.  
9 3. To correct transcription errors.  
10 Page 56 Line 18 Reason 3  
11 From sentence to sentiment  
12 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_  
13 From \_\_\_\_\_ to \_\_\_\_\_  
14 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_  
15 From \_\_\_\_\_ to \_\_\_\_\_  
16 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_  
17 From \_\_\_\_\_ to \_\_\_\_\_  
18 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_  
19 From \_\_\_\_\_ to \_\_\_\_\_  
20 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_  
21 From \_\_\_\_\_ to \_\_\_\_\_  
22 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_  
23 From \_\_\_\_\_ to \_\_\_\_\_  
24 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_  
25 From \_\_\_\_\_ to \_\_\_\_\_

Express Deposition Services - Scheduling@expressdeposition.com  
(888)286-4226

# EXHIBIT 14

**CERTIFIED COPY**

**Express Deposition Services**



by EXPRESSNETWORK

1605 W. Olympic Blvd., Suite 800 Los Angeles, CA 90015

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

**ALEX VILLANUEVA vs COUNTY OF LOS ANGELES**

**MERCEDES CRUZ**

**March 28, 2025**

**Rick Galten, CSR No. 13202, Job No. 6522**



1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

3 ALEX VILLANUEVA, )

4 )

Plaintiff, )

5 )

vs. )

6 )

COUNTY OF LOS ANGELES, COUNTY )

7 OF LOS ANGELES SHERIFF'S )

DEPARTMENT, LOS ANGELES COUNTY )

8 BOARD OF SUPERVISORS, COUNTY )

EQUITY OVERSIGHT PANEL, LOS )

9 ANGELES COUNTY OFFICE OF )

INSPECTOR GENERAL, CONSTANCE )

10 KOMOROSKI, MERCEDES CRUZ, )

ROBERTA YANG, LAURA LECRIVAIN, )

11 SERGIO V. ESCOBEDO, RON )

KOPPERUD, ROBERT G. LUNA, )

12 MAX-GUSTAF HUNTSMAN, ESTHER )

LIM, and DOES 1 to 100, )

13 inclusive, )

14 )

Defendants. )

15 )

16 REMOTE DEPOSITION OF MERCEDES CRUZ

17

Friday, March 28, 2025

18

--o0o--

19

20

21

22

23

24

Reported by:

25 Rick Galten, CSR No. 13202

CRUZ, MERCEDES

Page 2

1 APPEARANCES:

2 For the Plaintiff:

3 Shegerian & Associates, Inc.  
4 11520 San Vicente Boulevard  
5 Los Angeles, California 90049  
6 (310) 860-0770  
7 Adibona@shegerianlaw.com  
8 BY: Alex DiBona, Esq.

9 For the Defendants:

10 Miller Barondess, LLP  
11 2121 Avenue of the Stars  
12 Suite 2600  
13 Los Angeles, California 90067  
14 (310) 552-5226  
15 jtokoro@millerbarondess.com  
16 BY: Jason H. Tokoro, Esq.

17 Also present:

18 Alex Villanueva

19

20

21

22

23

24

25

--o0o--

CRUZ, MERCEDES

Page 14

1 Have your duties on the CEOP changed at all  
2 since 2004?

3 A. Yes. Because we were the EOP. And then in  
4 2011, it expanded to the CEOP.

5 Q. What was the change from the EEOP to the CEOP?

6 A. For the EOP, it was just sheriffs. And for the  
7 CEOP, it was all designated County departments.

8 Q. Any other change since you've been on the panel  
9 other than it from going to the Sheriff's Department to  
10 all -- all County employees?

11 A. Well, they're -- they're constantly tweaking it  
12 to make it more efficient, to make it better. So yes,  
13 over the years, there have been changes.

14 Q. What, broadly speaking, is your understanding  
15 currently of what the CEOP does?

16 A. We oversee all of the internal investigations  
17 involving equity.

18 Q. And are you paid to be on the CEOP panel?

19 A. It's an hourly rate.

20 Q. And so without telling me the hourly rate, is it  
21 fair to say you bill time to the County for your work?

22 A. Yes.

23 Q. And with -- excuse me.

24 How do you get your assignments currently as a  
25 panelist?

CRUZ, MERCEDES

Page 15

1 A. Every month we're asked for our availability for  
2 the following month. And we give the dates that we're  
3 available for the days that the panel meets. And then  
4 somebody there assigns us to a panel or one or more  
5 panels.

6 Q. And when you're on a panel, is it all -- or is  
7 it always the same panel or does it rotate?

8 A. It rotates.

9 Q. And do you know who makes the decision on the  
10 rotation?

11 A. No.

12 Q. And how many people are generally on a panel --

13 A. Three.

14 Q. -- currently?

15 A. Sorry.

16 Q. No, it's fine. And how long -- excuse me.

17 How long has it been three?

18 A. I'm sorry, I didn't hear you.

19 Q. Sorry. I'll rephrase it. Excuse me.

20 Since you -- how long has -- when you sat on a  
21 panel at the CEOP has it been three members?

22 A. I want to say since we were the CEOP. Because  
23 at Sheriff's, it was more.

24 Q. And the recommendations for the panel, is it  
25 done by majority vote?

CRUZ, MERCEDES

Page 16

1 A. It's more complicated than that.

2 Q. Can you -- if you can, can you explain how it's  
3 more complicated than that.

4 A. Well, basically, what happens is that we meet to  
5 discuss what we think the recommendations should be.  
6 And we try to come to a consensus. And if we don't, we  
7 go inconclusive. And we're either the Department  
8 doesn't need to attend inconclusive, which means no  
9 matter -- there's just not enough information available  
10 to come to any reasonable decision, or we're  
11 inconclusive and we want to meet with the Department.

12 And in that case, we have an exchange of  
13 information with the Department to see if the panel can  
14 come to a consensus.

15 And it's usually a group decision, so you go  
16 back and forth. The Department gives you feedback, then  
17 we caucus, and see if we're all on the same page at that  
18 point. So if somebody is inconclusive and two people  
19 want to go a different way, we end up inconclusive. Do  
20 you see what I'm saying? It's a little more  
21 complicated.

22 Q. I do. Since 2004, apart from  
23 Sheriff Villanueva, has a sheriff or former sheriff ever  
24 come before the panel?

25 A. I wouldn't know that, because I would only know

CRUZ, MERCEDES

Page 26

1 recollection?

2 A. I want to say -- I'm terrible with names. I  
3 want to say Commander -- no, that was the chief.  
4 Laura's the chief. Ann's the lieutenant. And Sara  
5 Hough is the commander. Sorry, I don't remember their  
6 last names. But if you tell me, I'll know. I'm  
7 terrible with names, really bad.

8 Q. Do you remember anything that was said during  
9 the prebriefing or prehearing, excuse me?

10 A. Verbatim, no. But I think it was very  
11 straightforward. It was very short and very  
12 straightforward.

13 Q. Even if you don't remember verbatim, do you  
14 remember anything that was discussed at the prehearing?

15 A. Just, what were we going to do? Since he was no  
16 longer employed, we were founded on all charges except  
17 sexual harassment. And the only thing we can do is --  
18 for something like this, a top of file designation.  
19 It's pretty routine.

20 Q. And so just to be clear, at the pre- -- at the  
21 prehearing, there was already a determination to be  
22 founded on all charges but sexual harassment?

23 A. No, no, no. Sorry. You misunderstood. We  
24 arrived at that decision almost immediately, based on  
25 what we had read, based on the two reports that we had.

CRUZ, MERCEDES

Page 27

1 Q. And so being founded on all charges, when you  
2 say you arrived at that decision almost immediately,  
3 that decision, was that arrived at at the prehearing?

4 A. Yes.

5 Q. And then there was a discussion about -- at the  
6 prehearing that in light of us arriving at these  
7 conclusions, what are we going to do; is that right?

8 A. Right. I mean, what's the normal thing to do in  
9 such circumstances? And I -- I know I said top of file.  
10 And everyone said yes, that's -- that's the thing to do.  
11 'Cause he's not here anymore. That's all we can do. We  
12 can't suspend him. We can't fire him. We can't  
13 discipline him. And so that's what we do.

14 And it's basically a red flag, essentially, that  
15 you just say, hey, this person had some issues. Before  
16 you rehire them, if you're going to rehire them, look at  
17 the file.

18 Q. And I think I know, but in the context you're  
19 using it, what does top of file mean?

20 A. It is an administrative piece of paper, as I  
21 understand it, that it's a do not hire. And it's short  
22 for do not hire unless you read this file. That's my  
23 understanding. 'Cause -- that's my understanding.

24 Q. I'm going to send Exhibit 1 through the chat.

25 Do you see a document on your screen, Ms. Cruz?

CRUZ, MERCEDES

Page 32

1 able to do so?

2 A. No.

3 Q. Just to go now to the hearing for  
4 Sheriff Villanueva -- by the way, just to back up for a  
5 second, is it -- there were two investigations into  
6 Sheriff Villanueva, correct?

7 A. The two that I saw is all I know about.

8 Q. And those -- those were decided by the same  
9 panel at the same time, correct?

10 A. Correct.

11 Q. And at the hearing, was -- who was present at  
12 the actual hearing?

13 A. Aside from the people that were at the  
14 prehearing, it was the chief of equity, Laura.

15 Q. And do you remember anything that was said at  
16 the actual hearing itself?

17 A. No. It was pretty straightforward. We said  
18 that we were founded and -- on all charges except sexual  
19 harassment. And we were recommending top of file. And  
20 she agreed. And that's pretty much it.

21 Q. So it sounds, by the way, like the hearing was  
22 actually pretty short.

23 A. From my recollection, yes, it was very short.

24 Q. Less than 15 minutes?

25 A. That, I can't tell you. I --



CRUZ, MERCEDES

Page 40

1           A. My understanding is, he had the choice to be  
2 interviewed. And for whatever reason, he did not get  
3 interviewed. Here it says that because he wanted the  
4 questions. And of course, they wouldn't allow him to be  
5 treated any different than any other witness. So that  
6 wouldn't be permissible.

7           Q. By the way, do you know one way or the other if  
8 there was any type of a rule or practice that in the  
9 Sheriff's Department witnesses don't get the  
10 interview questions ahead of time?

11          A. That's my understanding.

12          Q. And -- and just so I'm clear, it's your  
13 understanding, based on what the sheriff's department  
14 told you; is that right?

15               MR. TOKORO: Objection. It misstates her  
16 testimony. She didn't say anything like that.

17               But you can answer the question.

18               THE WITNESS: Essentially, I've been on the  
19 panel almost 20-something years. And I've never  
20 encountered any situation where they've given the  
21 questions ahead of time.

22               MR. DIBONA: Q. Do you see here there's a  
23 section called Mr. Huntsman's Name?

24          A. Yes.

25          Q. And do you see here that there's a reference to

CRUZ, MERCEDES

Page 41

1 Mr. Huntsman being born Max-Gustaf Edler?

2 A. I see that.

3 Q. And you also -- you have an understanding one of  
4 the complaints that Max Huntsman made against  
5 Sheriff Villanueva was that Sheriff Villanueva was  
6 referring to him as Max-Gustaf?

7 A. Correct.

8 Q. As a general matter, is there anything  
9 inappropriate about someone referring to someone as the  
10 name they were born with?

11 MR. TOKORO: Objection. It misstates the facts  
12 as not what Mr. Villanueva was referring to Mr. Huntsman  
13 as.

14 But you can otherwise answer that.

15 THE WITNESS: Basically, you should not call  
16 somebody by a name that they were no longer going by or  
17 choose not to go by. And I think Mr. Huntsman made it  
18 very clear that he had changed his name, that he did not  
19 go by any other name. And you should not call an  
20 employee by a name that they don't want to be called by  
21 if there's no legitimate business reason for doing so.

22 MR. DIBONA: Q. And did you have an  
23 understanding one way or another if Max-Gustaf -- I'm  
24 sorry.

25 Do you have an understanding one way or another

CRUZ, MERCEDES

Page 42

1 if Max Huntsman had a plaque on his desk that read  
2 Max-Gustaf?

3 A. Quite frankly, I don't really care what he had  
4 on his desk. He made it very clear that he did not want  
5 to be called that and did not want to be associated with  
6 his German heritage.

7 Q. And did you have an understanding one way or the  
8 other if Max Huntsman was still listed on the California  
9 State Bar website as Max-Gustaf Huntsman?

10 MR. TOKORO: Objection. Misstates the facts,  
11 misstates the record, misstates the exhibits produced  
12 and used in this case.

13 But you can answer if you know.

14 THE WITNESS: Again, I'm really not concerned  
15 about what the State Bar says about his name. My  
16 concern is about the employee and his well-being. And  
17 there was no business necessity for calling him a name  
18 that made him uncomfortable and that he made clear he  
19 did not want to be called.

20 MR. DIBONA: Q. And separate and apart from  
21 Max-Gustaf Huntsman -- excuse me.

22 Do you have an understanding that at the State  
23 Bar, the name you are listed by is your legal name?

24 MR. TOKORO: Once again, objection. Misstates  
25 the record, misstates the facts, misstates the exhibits.

CRUZ, MERCEDES

Page 71

1 Do you believe Sheriff Villanueva ever -- strike  
2 that.

3 Do you have any reason to believe that when  
4 Sheriff Villanueva discussed the motion Ms. Kim  
5 (verbatim) drafted on behalf of Hilda Solis on the July  
6 28, 2021, Facebook Live, he was in any way  
7 discriminating against her because of her race?

8 A. I wouldn't know. All I know is that she felt  
9 singled out because at the time it was COVID. Asians  
10 were very sensitive about being singled out, because  
11 they were subject to ridicule. A lot of people had, you  
12 know, very bad feelings about anyone who didn't come  
13 from the U.S., that they were bringing, you know, these  
14 diseases into our country. And the Asians took it more  
15 than anyone else. And she felt very sensitive about it,  
16 that she was being singled out, because she was an easy  
17 target.

18 So I don't know what his motivations were. But  
19 as I said, if you ignore the entire Lim report, I had  
20 enough on just Max Huntsman to put a top of the file  
21 recommendation. So, you know, all of these  
22 contemporaneous little things, it's the totality of the  
23 circumstances that I looked at.

24 Q. Yeah --

25 A. And I truly believed that he, you know, took the

CRUZ, MERCEDES

Page 77

1 it, 'cause it's -- it's much more complicated. And  
2 that's why I asked if you're an employment attorney,  
3 'cause you know it's gray. And it -- there's a lot that  
4 goes into that.

5 Sometimes it's important, sometimes it's not.  
6 Sometimes it goes to the corroboration of other  
7 witnesses who have specifics. Some witnesses don't have  
8 specifics, but it -- they're saying, yeah, you know,  
9 they don't walk around with tape recorders. They don't  
10 walk around taking notes, generally speaking. It's just  
11 what they can recall.

12 And she recalls him making statements. She  
13 can't recall the specifics. But others recall  
14 specifics. Maybe not about Holly, but about the other  
15 supervisors.

16 So that's what I'm looking at. Sometimes it's  
17 enough that, you know, three or four or five employees  
18 are all saying the same thing. They may not have, you  
19 know, the specific words that were used, but they're  
20 saying, yeah, you know, I remember him saying something  
21 really offensive based on his race. I just can't  
22 remember exactly what it was.

23 But that goes to lending corroboration to the  
24 other person saying, I remember exactly what it was.

25 MR. DIBONA: Q. And was anything

CRUZ, MERCEDES

Page 78

1 Sheriff Villanueva said about Holly Mitchell one of the  
2 reasons the CEOP put a do not -- recommended a do not  
3 rehire notation top of file?

4 A. Again, the same thing. It goes to the totality  
5 of the report. We didn't take a single sentence and  
6 say, oh, that's why we're coming to that conclusion.

7 Q. So Ms. Cruz, do you agree with me that as a  
8 general matter, in order to use something as a basis to  
9 impose discipline, you would actually need to know what  
10 was said?

11 MR. TOKORO: Objection. That question was just  
12 asked. And she just answered it.

13 You can answer it again.

14 THE WITNESS: No, I really can't. I just want  
15 to reiterate, just repeat my answer.

16 MR. DIBONA: Q. You can do that.

17 A. I repeat my answer.

18 Q. Do you see here there's a reference to,

19 "Ms. Lim has drafted many motions about  
20 accountability. And as a result,  
21 Sheriff Villanueva goes after Ms. Lim and  
22 Supervisor Solis."

23 Did I read that correctly?

24 A. That looks like what you read.

25 Q. And do you have an understanding -- I'm sorry,

CRUZ, MERCEDES

Page 116

1 on -- take it one at a time -- based on ethnicity?

2 A. Both Max and Lim.

3 Q. And why do you believe he discriminated against  
4 Esther Lim on the basis of her ethnicity? What's the  
5 reason for the CEOP's recommendation that this charge be  
6 founded?

7 A. We believe that he targeted her because of her  
8 Asian -- Asian ancestry and his previous behavior  
9 towards Sachi and the things that happened with her.  
10 And it -- and that was the effect that it had on this  
11 young woman of Asian ancestry, that she felt singled  
12 out. And there were -- was evidence that, in fact, she  
13 was singled out for certain behavior, including being  
14 investigated and being, you know, called a flunky and  
15 all these different things that occurred.

16 And based on the totality of the reports, we  
17 believed that that charge was, in fact, founded. And  
18 again, this is based on a violation of the policy, not  
19 the law.

20 Q. And -- sorry, just to take -- what was -- who is  
21 Sachi, that you're referring to?

22 A. She was the former CEO --

23 Q. And --

24 A. -- of the County.

25 Q. And what was your understanding of

CRUZ, MERCEDES

Page 118

1 Tweets?

2 A. No. I believe he singled her out because she  
3 was trying to do her job --

4 Q. And her job --

5 A. -- of oversight.

6 Q. Okay. I'm sorry, you -- I cut you off.

7 She was singled out because she was trying to do  
8 her job, and her job was oversight? Was that -- was  
9 that your answer?

10 A. That was part of her job, yes.

11 Q. Apologies for cutting that off.

12 Any other reason you believe Sheriff Villanueva  
13 was singling out Esther Lim?

14 A. For the totality of what was in the report. And  
15 I didn't memorize the report.

16 Q. And for the policy of equality sexual  
17 harassment, that charge was unfounded, correct?

18 A. That's correct.

19 Q. And it's fair to believe you still believe it  
20 should have been unfounded as you sit here today,  
21 correct?

22 A. Absolutely.

23 Q. For policy of equality discriminatory harassment  
24 based on gender and ethnicity, do you see here that  
25 there was a charge founded?



CRUZ, MERCEDES

Page 119

1 A. It was.

2 Q. And why do you believe this charge should be  
3 founded?

4 A. Because Ms. Lim was subjected to contact that  
5 had the effect or impact of interfering with her ability  
6 to do her job and that was based on a protected basis:  
7 Her gender and her ethnicity. And I believe that I  
8 testified to numerous different reasons why he behaved  
9 in this way towards her and that she very much was  
10 intimidated and felt that she had a hostile work  
11 environment and that she was unable to do her job, based  
12 on having things been very difficult for her.

13 Q. You see here there's a policy of equality  
14 violation of third-person harassment based on gender and  
15 ethnicity, and the charge was founded, correct?

16 A. Absolutely.

17 Q. And why do you believe this charge should have  
18 been founded?

19 A. She had to watch while her boss and the other  
20 Board of Supervisors members and the deputies were  
21 denigrated because of their gender. It wasn't at all  
22 clear to me why the sheriff had a problem with the  
23 entire Board being female, when the entire Board has  
24 been male in the past, or a combination thereof.

25 And I believe that each of them had to see their

CRUZ, MERCEDES

Page 120

1 colleagues being told that they're -- you know, that  
2 they're just a bunch of flunkies out of college,  
3 20-year-olds, when a lot of those women were mature  
4 women with degrees, master degrees, bachelor degrees,  
5 and experience and that he was denigrating their work  
6 performance and what they were trying to do in the  
7 media. All of that went to third-person harassment.

8 Q. And anything else related to third-person  
9 harassment other than what you testified about?

10 A. Yes. I would say I -- again, I have not  
11 memorized the report, but with the totality of the  
12 report.

13 Q. And for "policy of equality inappropriate  
14 conduct towards others (based on gender and ethnicity)."

15 Do you see here the charge was founded?

16 A. Absolutely.

17 Q. And --

18 A. That's a lesser-included charge. So basically,  
19 if you violate the more significant charge, you violated  
20 the inappropriate conduct towards others.

21 Q. What -- I think I know, but what do you mean  
22 when you say lesser-included charge?

23 A. It's a charge that's eaten up by the bigger  
24 charge. The smaller charge, inappropriate conduct  
25 towards others, is meant to stop behavior that is

CRUZ, MERCEDES

Page 121

1 inappropriate before it violates the bigger charge.

2 Q. Okay.

3 A. And so it's included, it sort of gets eaten up  
4 by the fact that you violated the bigger charge.

5 Q. Okay. So what I hear you saying -- correct me  
6 if I'm wrong -- because he violated the policy of  
7 equality related to third-person harassment, he also  
8 violated the policy of equality for inappropriate  
9 conduct towards others.

10 Is that what you're saying?

11 A. And the discrimination one and the harassment  
12 one.

13 Q. Okay. And so is it the inappropriate conduct  
14 towards others, are those the same reasons for the --  
15 what we've looked at? Or are they -- are the --  
16 anything different?

17 A. No, it's the totality of the report. And again,  
18 the more significant charges would encompass the  
19 inappropriate conduct.

20 Q. Let me just ask it this way.

21 Is there anything that you believe goes to  
22 upholding the inappropriate conduct towards others based  
23 on gender, ethnicity, that you didn't mention for the  
24 third-person harassment or the discrimination on the  
25 basis of gender and ethnicity?

CRUZ, MERCEDES

Page 122

1 A. Again, the harassment and the discrimination and  
2 the third-party, all of those three charges could go to  
3 the inappropriate conduct towards others, in addition to  
4 the actual report.

5 Q. Right. And my question -- maybe just -- I think  
6 you're answering it. I just want to be clear.

7 Is there anything else that -- else besides --  
8 that goes to inappropriate conduct towards others  
9 separate -- that's not included in gender, harassment,  
10 and discrimination and third-person harassment?

11 A. Again, I don't believe that there would be,  
12 because it -- the bigger charges eat up the little  
13 charge. The little charge is, as I said, a lesser  
14 included charge. So if you violated the bigger charge,  
15 you violated the little charge.

16 Q. For policy for equality based on retaliation  
17 based on gender and ethnicity, the charge was founded?

18 A. It was.

19 Q. And why do you believe -- what's the reason for  
20 the CEOP's recommendation that the charge be founded for  
21 the -- as relates to retaliation?

22 A. As I testified, again, I haven't memorized the  
23 report. But based on my recollection, this would be him  
24 sending the letters, trying to get her fired. The  
25 effect it had on her. The effect that his comments were

CRUZ, MERCEDES

Page 123

1 having on her job and her ability to do her job. And  
2 all of this, the investigation that he opened on her, be  
3 it -- however you want to characterize it, he was using  
4 his position as the sheriff to open an investigation  
5 into her personal social media.

6 And I don't believe that was appropriate. And I  
7 do believe that it interferes with her ability to do her  
8 job and was retaliatory for her trying to do her job.

9 Q. Do you believe -- just to be clear, do you  
10 believe the Tweets were her trying to do her job?

11 A. No. The -- well, it depends on which Tweets  
12 we're talking about. There were many Tweets. And there  
13 were Tweets that were her personal Tweets and then there  
14 were Tweets that she did as the ACLU person.

15 But the fact that he was trying to get into her  
16 personal Tweets and bring it into the business arena and  
17 trying to get her fired for those things was  
18 intimidating to her and it caused her not to be able to  
19 do her job effectively, which was to oversee the  
20 Sheriff's Department, turning off computers, not  
21 responding to subpoenas, not allowing her access to the  
22 materials she needed for her job, denigrating her job,  
23 denigrating her, denigrating the supervisors. I mean,  
24 on and on.

25 Q. So Ms. Cruz, just to be clear, you have an

CRUZ, MERCEDES

Page 127

1 violations?

2 MR. TOKORO: Objection. Assumes facts not in  
3 evidence, is a hypothetical, given that he was not the  
4 sheriff at the time of the CEOP hearing. May also call  
5 for a legal conclusion.

6 But you can answer.

7 THE WITNESS: It didn't come up.

8 MR. DIBONA: Q. And the reason for the do not  
9 rehire notation was because since he was no longer with  
10 the Sheriff's Department, the -- you didn't believe you  
11 could give him any discipline, correct?

12 MR. TOKORO: Objection. It misstates her  
13 testimony for why they recommended a do not rehire. All  
14 the reasons in the report, as she's testified  
15 repeatedly.

16 But you can answer.

17 THE WITNESS: Again, the reason for a do not  
18 rehire is that the investigation is founded. The  
19 employee or the person is no longer part of the County.  
20 And it is the only thing that we can do in response if  
21 the charges are significant. And here, they were.

22 MR. DIBONA: Q. And my question -- just to  
23 follow up on that, the reason it's the only thing you  
24 could do in this case is because Sheriff Villanueva was  
25 no longer with the Sheriff's Department; is that right?

CRUZ, MERCEDES

Page 131

1 MR. TOKORO: I'm going to object and instruct  
2 the witness not to answer that question for the reasons  
3 we've discussed already.

4 MR. DIBONA: Q. And Ms. Cruz, are you going to  
5 take your attorney's advice and not answer the question?

6 A. Yes.

7 Q. Since the CEOP hearing, have you had any  
8 discussions with Max Huntsman?

9 A. No.

10 Q. Since the CEOP hearing, have you had any  
11 discussions with Esther Lim?

12 A. No.

13 Q. Since the CEOP hearing, have you had any  
14 discussions with Alex Villanueva?

15 A. No.

16 Q. And since the CEOP hearing, have you had any  
17 discussions with Veronica Pawlowski?

18 A. No.

19 Q. And since the CEOP hearing, have you had any  
20 discussions with Kyla Coates?

21 A. No.

22 Q. And is it fair to say if someone asked to be  
23 testified -- to testify on behalf of the County  
24 regarding the reasons for the CEOP's recommendation for  
25 the do not rehire, you personally believe the charges

CRUZ, MERCEDES

Page 132

1 should have been founded against Sheriff Villanueva,  
2 correct?

3 A. I do.

4 Q. And you stand by the CEOP's recommendation,  
5 correct?

6 A. I do.

7 Q. And it's -- it's fair to say nothing you've seen  
8 at all since the CEOP's recommendation, including at  
9 this deposition, has caused you to rethink any of that,  
10 has it?

11 A. No, not at all.

12 MR. DIBONA: Okay. I think I'll be close to  
13 done soon, if not already done. I understand you might  
14 have some questions, Counsel.

15 But can we just take another five-minute break  
16 and then I'll wrap up at least my questioning very soon.

17 MR. TOKORO: Sounds good. Let's go off the  
18 record.

19 (Off the record from 2:03 to 2:13.)

20 MR. DIBONA: Q. Ms. Cruz, do you understand  
21 you're still under oath?

22 A. I do.

23 Q. Is there any reason you can't continue to give  
24 your best testimony?

25 A. No.



CRUZ, MERCEDES

Page 137

1 time to see if Sheriff Villanueva was available for an  
2 interview?

3 A. No.

4 Q. Did you ever -- excuse me.

5 Is there any part of your testimony that you  
6 believe needs to be changed as you sit here today?

7 A. I wouldn't know that without seeing the  
8 transcript.

9 MR. DIBONA: And I don't have any further  
10 questions.

11 Do you, Counsel?

12 MR. TOKORO: I do.

13 And Rick, I'm going to get as close as possible  
14 and speak as loudly as possible. I'm not intending to  
15 yell at anyone. I just want to make sure you hear my  
16 questions loud and clear.

17 And if you don't hear me, for whatever reason,  
18 just let me know and I'm happy to re-ask.

19 That work for you, Rick?

20 THE REPORTER: Yes, thank you.

21 EXAMINATION

22 BY MR. TOKORO: Q. Ms. Cruz, did Sheriff  
23 Robert Luna have anything to do with the CEOP's  
24 recommendations regarding the Huntsman and Lim  
25 complaints?

CRUZ, MERCEDES

Page 138

1 A. No.

2 Q. Okay. Did Sheriff Robert Luna attend the CEOP  
3 prehearing?

4 A. No.

5 Q. Okay. Did Sheriff Robert Luna attend the CEOP  
6 hearing?

7 A. No.

8 Q. Did you ever at any time speak with Sheriff  
9 Robert Luna about the Huntsman complaint?

10 A. No.

11 Q. Did you at any time ever speak with Sheriff Luna  
12 about the Lim complaint?

13 A. No.

14 Q. Okay. Did any of the Board supervisors for the  
15 Los Angeles County Board of Supervisors have any  
16 involvement in the CEOP's recommendations regarding the  
17 Huntsman and Lim complaints?

18 A. No.

19 Q. Okay. Did any of the Board of Supervisors  
20 attend the CEOP hearing?

21 A. No.

22 Q. Okay. Did any of the Board of Supervisors  
23 attend the CEOP prehearing?

24 A. No.

25 Q. Did you have communications with any member of

CRUZ, MERCEDES

Page 140

1 Q. Now, you were asked earlier whether you were  
2 aware that Mr. Villanueva was running for the Board of  
3 Supervisors when the CEOP hearing happened.

4 Do you recall that?

5 A. I do.

6 Q. I believe you said you were not aware; is that  
7 true?

8 A. I totally was not aware of that.

9 Q. So was Mr. Villanueva running for the Board of  
10 Supervisors -- did that have any impact on the CEOP's  
11 recommendations regarding the Huntsman complaint?

12 A. No.

13 Q. Okay. Did it have any impact on the CEOP's  
14 recommendations regarding the Lim complaint?

15 A. No.

16 Q. Were the CEOP's recommendations regarding the  
17 Huntsman complaint an attempt by the County to prevent  
18 Mr. Villanueva from being elected to the Board of  
19 Supervisors?

20 MR. DIBONA: Objection. Form.

21 THE WITNESS: Could you repeat the question.

22 MR. TOKORO: Sure.

23 Q. Were the CEOP's recommendations regarding the  
24 Huntsman complaint an attempt to prevent Mr. Villanueva  
25 from being elected to the Board of Supervisors?

CRUZ, MERCEDES

Page 141

1 A. No.

2 Q. Were the CEOP's recommendations regarding the  
3 Lim complaint an attempt to prevent him from being  
4 elected to the Board of Supervisors?

5 A. No.

6 Q. Now, Mr. Villanueva has alleged in this case  
7 that the CEOP's recommendations and the Department's  
8 concurrence were in retaliation for positions he took on  
9 certain measures and other things before the Board. I  
10 want to talk to you about some of those now.

11 Do you know what Measure A is?

12 A. No.

13 Q. Okay. Did Measure A have anything to do with  
14 the CEOP's recommendations regarding the Huntsman and  
15 Lim complaints?

16 A. No.

17 Q. Okay. Did Mr. Villanueva's opposition to  
18 Measure A have anything to do with the CEOP's  
19 recommendations regarding the Huntsman and Lim  
20 complaints?

21 MR. DIBONA: Objection, form.

22 MR. TOKORO: Q. Was Measure A discussed in any  
23 way during the CEOP prehearing or hearing?

24 A. No.

25 Q. Do you know what Measure J is?

CRUZ, MERCEDES

Page 142

1 A. No.

2 Q. Okay. Did Measure J have anything to do with  
3 the CEOP's recommendations?

4 A. No.

5 Q. Okay. Did measure -- did Mr. Villanueva's  
6 opposition to Measure J have anything to do with the  
7 CEOP's recommendations?

8 A. No.

9 Q. Was Measure J discussed in any way during the  
10 CEOP hearing or prehearing?

11 A. No.

12 Q. Do you know what Measure R is?

13 A. No.

14 Q. Was -- did Measure R have any impact on the  
15 CEOP's recommendations regarding the Huntsman or Lim  
16 complaints?

17 A. No.

18 Q. Okay. Did Mr. Villanueva's opposition to  
19 Measure R have any impact on the CEOP's recommendations?

20 A. No.

21 Q. Was Measure R discussed in any way during the  
22 prehearing or the hearing?

23 A. No.

24 Q. Now, what about COVID vaccine mandates? Was  
25 that discussed during the CEOP prehearing or hearing?

CRUZ, MERCEDES

Page 143

1 A. No.

2 Q. Was the County's mandatory COVID vaccine --  
3 vaccination any factor in the CEOP's recommendations?

4 A. No.

5 Q. Was Mr. Villanueva's refusal to enforce the  
6 County's COVID vaccine mandate, did that have any impact  
7 on the CEOP's recommendations?

8 A. No.

9 Q. Do you know what the Fulgent testing contract  
10 is?

11 A. No.

12 Q. Did the Fulgent testing contract with the County  
13 have anything to do with the CEOP's recommendations?

14 A. No.

15 Q. Okay. Did Mr. Villanueva's opposition to the  
16 Fulgent contract have anything to do with the CEOP's  
17 recommendations?

18 A. No.

19 Q. Was the Fulgent contract discussed in any way,  
20 shape, or form during the CEOP prehearing or hearing?

21 A. No.

22 Q. Were the CEOP's recommendations retaliation  
23 against Mr. Villanueva?

24 A. Absolutely not. Don't have anything -- I  
25 personally have nothing -- I have no relationship,

CRUZ, MERCEDES

Page 144

1 nothing. I have no reason for doing that.

2 Q. Now, when the CEOP was considering the Huntsman  
3 complaint, did you treat Mr. Villanueva any differently  
4 than you would any other subject of an investigation?

5 A. Absolutely not.

6 Q. When the CEOP was considering the Lim  
7 investigation, did you treat Mr. Villanueva any  
8 differently than you would any other employee of the  
9 County?

10 A. No.

11 MR. TOKORO: Thank you.

12 MR. DIBONA: I have just a couple follow-up  
13 questions.

14 FURTHER EXAMINATION

15 BY MR. DIBONA: Q. Ms. Cruz, do you know why  
16 the other two panel members recommended the do not  
17 rehire notation for Sheriff Villanueva?

18 A. For the reasons that I've given today. And they  
19 may have additional reasons, but basically, we all  
20 discussed that we were founded and we all discussed that  
21 that was the appropriate result.

22 Q. Was it ever brought up at the CEOP hearing that  
23 Esther Lim was having difficulty doing her job because  
24 of the actions of Sheriff Villanueva?

25 A. I don't recall discussing the specifics of the

CRUZ, MERCEDES

Page 145

1 report. I know that we were basically all founded,  
2 based on the totality of the two reports and that we  
3 both -- we all agreed there wasn't any, like -- we had  
4 to, you know, twist somebody's arm. It was pretty  
5 straightforward.

6 Q. Was any -- was it discussed at all that Max  
7 Huntsman was having difficulty doing his job?

8 A. That's correct. I don't have a specific  
9 recollection of that being discussed specifically. All  
10 I do remember is that we came to the same result  
11 relatively quickly and that there was no disagreement  
12 that the charges were founded. We were very much  
13 aligned. And now, you know, what's the appropriate  
14 measure? We agree on topic by yes, yes. And that was  
15 pretty much it.

16 MR. DIBONA: I don't have any further questions.

17 MR. TOKORO: Great. Let's go off the record.

18 DEPOSITION OFFICER: Counsel, would you like to  
19 order a copy of the transcript?

20 MR. TOKORO: I do. So what we've been doing for  
21 all of these depositions is having the witness's copy  
22 sent to our office. And we'll forward it to her for  
23 signature and errata.

24 And then our office will order a copy. And I  
25 believe my assistant has been coordinating that. But



CRUZ, MERCEDES

Page 148

1 DEPOSITION OFFICER'S CERTIFICATE

2 STATE OF CALIFORNIA )  
 ) ss.  
3 COUNTY OF SAN FRANCISCO)

4

5

6 I, Rick Galten, hereby certify:

7 I am a duly qualified Certified Shorthand  
8 Reporter in the State of California, holder of  
9 Certificate Number CSR 13202 issued by the Court  
10 Reporters Board of California and which is in full force  
11 and effect. (Fed. R. Civ. P. 28(a)).

12 I am authorized to administer oaths or  
13 affirmations pursuant to California Code of Civil  
14 Procedure, Section 2093(b) and prior to being examined,  
15 the witness was first duly sworn by me. (Fed. R. Civ.  
16 P. 28(a), 30(f)(1)).

17 I am not a relative or employee or attorney or  
18 counsel of any of the parties, nor am I a relative or  
19 employee of such attorney or counsel, nor am I  
20 financially interested in this action. (Fed. R. Civ. P.  
21 28).

22 I am the deposition officer that  
23 stenographically recorded the testimony in the foregoing  
24 deposition and the foregoing transcript is a true record  
25 ///

*Express Deposition Services - Scheduling@expressdeposition.com*  
*(888)286-4226*

CRUZ, MERCEDES

Page 149

1 of the testimony given by the witness. (Fed. R. Civ. P.  
2 30(f)(1)).

3 Before completion of the deposition, review of  
4 the transcript [X] was [ ] was not requested. If  
5 requested, any changes made by the deponent (and  
6 provided to the reporter) during the period allowed, are  
7 appended hereto. (Fe. R. Civ. P. 30(e)).

8 Dated: April 2, 2025

9

10

A handwritten signature in blue ink, appearing to read "Rick Yalton", is written over a horizontal line.

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

# EXHIBIT 15

**CERTIFIED COPY**

**Express Deposition Services**



by EXPRESSNETWORK

1605 W. Olympic Blvd., Suite 800 Los Angeles, CA 90015

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ALEX VILLANUEVA vs COUNTY OF LOS ANGELES

VERONICA PAWLOWSKI, VOLUME II

April 04, 2025

Shannon D. Denney, CSR No. 10385, Job No. 7156

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ALEX VILLANUEVA, )  
 )  
 Plaintiff, )  
 )  
 vs. ) No: 2:24-cv-04979  
 ) SVW (JCx)  
 COUNTY OF LOS ANGELES, COUNTY OF )  
 LOS ANGELES SHERIFFS DEPARTMENT, )  
 LOS ANGELES COUNTY BOARD OF )  
 SUPERVISORS, COUNTY EQUITY )  
 OVERSIGHT PANEL, LOS ANGELES COUNTY )  
 OFFICE OF INSPECTOR GENERAL, )  
 CONSTANCE KOMOROSKI, MERCEDES CRUZ, )  
 ROBERTA YANG, LAURA LECRIVAIN, )  
 SERGIO V. ESCOBEDO, RON KOPPERUD, )  
 ROBERT G. LUNA, MAX-GUSTAF HUNTSMAN )  
 ESTHER LIM, and DOES 1 to 100, )  
 inclusive, )  
 )  
 Defendants. )  
 )  
 )

DEPOSITION OF: VERONICA PAWLOWSKI

VOLUME II

April 4, 2025

REPORTED BY: SHANNON D. DENNEY, CSR No. 10385

1 APPEARANCES

2

3 For the Plaintiff:

4 SHEGERIAN & ASSOCIATES, INC.  
5 BY: ALEX DIBONA, ESQ.  
6 aDiBona@shegerianlaw.com  
11520 San Vicente Boulevard  
Los Angeles, CA 90049

7

8 For the Defendants:

9 MILLER BARONDESS, LLP  
10 BY: JASON H. TOKORO, ESQ.  
jtokoro@millerbarondess.com  
2121 Avenue of the Stars, Suite 2600  
11 Los Angeles, CA 90067

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1 But, otherwise, you can answer.

2 THE WITNESS: I don't remember.

3 Q. MR. DiBONA: And did you make any public  
4 statements in support of now Sheriff Luna's candidacy  
5 to become sheriff?

6 A. No. I did not.

7 Q. Did you tell anyone, privately, that they  
8 should vote for Sheriff Luna?

9 A. No. I did not.

10 Q. And did you did tell anyone, privately, that  
11 they should not vote for then Sheriff Villanueva?

12 A. No. I did not.

13 Q. As you sit here today, do you believe any  
14 part of your testimony needs to be changed for any  
15 reason?

16 A. Not that I can think of, no.

17 Q. And just to be clear, since we ended last  
18 deposition, you'll have a chance to review.

19 Do you have any recollection that anything  
20 you said in the first deposition needs to be changed at  
21 all?

22 A. Not that I can think of, no.

23 MR. DiBONA: I don't have any further  
24 questions.

25 Do you, Counsel?

1

2

EXAMINATION BY

3

4

5

6

7

8

Q. MR. TOKORO: I do. Shannon, let me know if you can't hear me for any reason. We swapped the computer, so I'm hoping that it's a little better. But I'm also speaking as loudly as I can without yelling.

Ms. Pawlowski, I'd like to ask you a few questions.

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Did you have any conversations with Sheriff Luna, at any time, about Ms. Lim's complaint?

A. No. I did not.

Q. Did you, at any time, have conversation with Mr. Luna -- sorry, Sheriff Luna about Mr. Huntsman's complaint?

A. No. I did not.

Q. Did you, at any time, have a conversation with Sheriff Luna about your interview with Christine Dias-Herrera?

A. No. I did not.

Q. Did you ever have a conversation with -- well, I don't need to ask that question.

Did you ever have a conversation with anyone while any member of the Board of Supervisors about Ms. Lim's complaint?

A. No. I did not.



1 Q. Did you ever have any conversations with  
2 anyone, any of the Board of Supervisors, regarding Mr.  
3 Huntsman's complaint?

4 A. No. I did not.

5 Q. Did you ever have a conversation with  
6 Supervisor Solis about Ms. Lim's or Mr. Huntsman's  
7 complaints?

8 A. No. I did not.

9 Q. Did you ever have a conversation with  
10 Supervisor Kuehl about Mr. Huntsman or Ms. Lim's  
11 complaints?

12 A. No. I did not.

13 Q. Did any member of the Board of Supervisors  
14 direct you, in any way, regarding your interview with  
15 Ms. Christine Dias-Herrera?

16 A. No.

17 Q. Now, you were asked a number of questions by  
18 Mr. DiBona about ballot measures. I did want to follow  
19 up on those, specifically the question Mr. DiBona did  
20 not ask you.

21 Did ballot Measure A have anything to do with  
22 the interview you gave with Ms. Christine  
23 Dias-Herrera?

24 MR. DiBONA: Object to form.

25 You can answer, of course.

1 THE WITNESS: Can you say that again?

2 Q. MR. TOKORO: Did ballot Measure A have  
3 anything to do with the interview you did with Ms.  
4 Dias-Herrera?

5 MR. DiBONA: Same objection.

6 THE WITNESS: No.

7 Q. MR. TOKORO: Did ballot Measure A, and  
8 Mr. Villanueva's opposition to it, have anything to do  
9 with that interview?

10 MR. DiBONA: Same objection.

11 THE WITNESS: No.

12 Q. MR. TOKORO: Did ballot Measure J have  
13 anything to do with that interview?

14 A. No.

15 Q. Did Mr. Villanueva's opposition to ballot  
16 Measure J have anything to do with your interview?

17 MR. DiBONA: Object to form.

18 THE WITNESS: No.

19 Q. MR. TOKORO: Did ballot Measure R have  
20 anything to do with the statements you made during your  
21 interview?

22 MR. DiBONA: Object to form.

23 THE WITNESS: No.

24 Q. MR. TOKORO: Did Mr. Villanueva's opposition  
25 to ballot Measure R have anything to do with your

1 interview?

2 MR. DiBONA: Object to form.

3 THE WITNESS: No.

4 Q. MR. TOKORO: Did the COVID vaccine mandate  
5 have anything to do with your interview with Ms.  
6 Dias-Herrera?

7 MR. DiBONA: Object to form.

8 THE WITNESS: No.

9 Q. MR. TOKORO: Did Mr. Villanueva's opposition  
10 to the COVID have anything to do with your interview?

11 MR. DiBONA: Object to form.

12 THE WITNESS: No.

13 Q. MR. TOKORO: Did the county contract,  
14 regarding COVID testing, have anything to do with your  
15 interview?

16 MR. DiBONA: Object to form?

17 THE WITNESS: No.

18 MR. TOKORO: Did Mr. Villanueva's opposition  
19 to the full again contract have anything to do with  
20 your interview?

21 MR. DiBONA: Object to form.

22 THE WITNESS: No.

23 Q. MR. TOKORO: The interview that you gave to  
24 Ms. Christine Dias-Herrera, were you truthful and  
25 honest during that interview?

1 A. Yes.

2 Q. Do you stand by the statements you gave to  
3 Ms. Dias-Herrera?

4 A. I do.

5 Q. The statements that you gave during that  
6 interview, were they intended, in any way, to retaliate  
7 against Mr. Villanueva?

8 A. No.

9 Q. Now, you were asked by Mr. DiBona whether the  
10 Board was all women at the time that Mr. Villanueva was  
11 making these statements about them publicly.

12 Do you recall you that?

13 A. Yes.

14 Q. When Mr. Villanueva was going around saying  
15 the Board was all women, did you view that as something  
16 positive that he was saying, or something that was  
17 negative or disparaging?

18 MR. DiBONA: Object to form.

19 THE WITNESS: That was definitely negative or  
20 disparaging.

21 And I'll share that. The fact that the  
22 county had elected a Board of Supervisors of all women  
23 was held up in a very positive light in a number of  
24 forums. Writeups in a newspaper, or magazine. So  
25 there were definitely instances in which this fact that

1 there were five women was held up as a positive thing  
2 for county.

3 And so when the Sheriff would say it, and the  
4 way he said it, it was crystal clear that he was not up  
5 lifting it in a is positive way in the manner others  
6 had done so. It was clear that he was saying it with  
7 negative implications.

8 Q. MR. TOKORO: Now Mr. DiBona asked you a  
9 number of questions about your understanding of how Ms.  
10 Lim felt about Mr. Villanueva's comments.

11 Do you recall that?

12 A. Yes.

13 Q. I think you said she was distressed, and  
14 other things.

15 Do you recall that?

16 A. Yes.

17 MR. DiBONA: Object to form.

18 Q. MR. TOKORO: One of the things Mr. DiBona  
19 asked about, how these comments made you feel.

20 So how did Mr. Villanueva's comments, over  
21 these several years, make you feel?

22 A. I did mention the stress that I felt in my  
23 community when a member -- when a person at my child's  
24 school is questioning me on the position that I hold,  
25 and the person who I work for because of what they've

1 heard the sheriff say.

2 And again, I'll just say that I am a person  
3 who has worked extremely hard to get to where I am. I  
4 was the first person in my family to go to a four-year  
5 university, I graduated with honors. I then went on to  
6 a prestigious law school on the east coast. So I left  
7 my family for three years to pursue my law degree,  
8 because it was important to me to pursue it in at a  
9 school that was recognized as being a prestigious  
10 institution.

11 And then I had, by the time I joined the  
12 Board of Supervisors, I had dedicated roughly 20 years  
13 of my life to building my legal and professional  
14 reputation.

15 When you're a lawyer, people are going say  
16 negative things about you. That's just par for the  
17 course. When you work for an elected official, people  
18 be going to say negative things about you, and your  
19 boss, because that's politics.

20 But when the sheriff of Los Angeles County  
21 starts to attack your qualifications, your credentials,  
22 how well you perform your duties at work, it's an  
23 entirely separate matter.

24 And I will say that, for me, you know, I've  
25 done a lot of work in the justice space, and Child

1 Welfare, these are issues that you've dedicated much --  
2 the majority of my career to. And that includes I was  
3 a deputy district attorney my first job out of law  
4 school. So I have a fundamental respect for the legal  
5 system, for the criminal justice system.

6 I believe there's a lot of room for reform,  
7 but I am not a person who approaches my work from a  
8 position of being against law enforcement. And so to  
9 have the sheriff of LA County, the top law enforcement  
10 official in the county -- sorry, attacking my position  
11 that I hold in the way that Sheriff Villanueva was  
12 doing it, it was extremely demoralizing.

13 And ultimately, I left the Board, because I  
14 just couldn't be there in an environment where I was  
15 putting myself out there in that way, because I was  
16 afraid to go through something like that again.

17 So once he left office, and my boss  
18 Supervisor Kuehl left office, I left, too.

19 MR. TOKORO: No further questions.

20

21 FURTHER EXAMINATION BY

22 Q. MR. DiBONA: Sorry just to couple follow-ups,  
23 Ms. Pawlowski.

24 Did you ever tell Sheila Kuehl that you were  
25 a witness in Esther Lim's complaint?

1 STATE OF CALIFORNIA

2

3

4 I, SHANNON D. DENNEY, CSR 10385, a Certified  
5 Shorthand Reporter in and for the State of California,  
6 do hereby certify that, prior to being examined, the  
7 witness named in the foregoing deposition was by me  
8 duly sworn to testify the truth, the whole truth, and  
9 nothing but the truth; that said deposition was taken  
10 down by me in shorthand at the time and place named  
11 therein and was thereafter transcribed under my  
12 supervision; that this transcript contains a full, true  
13 and correct record of the proceedings which took place  
14 at the time and place set forth in the caption hereto.

15 I further certify that I have no interest in  
16 the event of this action.

17

18 EXECUTED this 17th day of April, 2025.

19

20

21

Shannon D. Denney

22

Shannon D. Denney, CSR 10385

23

24

25



# EXHIBIT 16

CERTIFIED COPY

**Express Deposition Services**



by EXPRESSNETWORK

1605 W. Olympic Blvd., Suite 800 Los Angeles, CA 90015

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ALEX VILLANUEVA vs COUNTY OF LOS ANGELES

JONATHAN LESTED

April 14, 2025

Wendy L. Graves, RPR, CSR No. 6138, Job No. 7522

1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION  
3  
4 ALEX VILLANUEVA, ) Case No.  
5 Plaintiff, ) 2:24-cv-04979 SVW  
6 vs. ) (JCx)  
7 )  
8 )  
9 )  
10 )  
11 )  
12 )  
13 )  
14 )  
15 )  
16 )  
17 )  
18 )  
19 )  
20 )  
21 )  
22 )  
23 )  
24 )  
25 )

17 DEPOSITION OF JONATHAN LESTED taken on behalf of  
18 Plaintiff, via Zoom video conference, beginning at  
19 10:04 a.m., April 14, 2025 before WENDY L. GRAVES, RPR,  
20 Certified Shorthand Reporter No. 6138.

1 A P P E A R A N C E S

2 FOR THE PLAINTIFF:

3 SHEGERIAN & ASSOCIATES LLP  
4 BY: SARA SALINAS, ESQ.  
11520 San Vicente Boulevard  
Los Angeles, California 90049  
5 (310) 860-0770  
SSalinas@shegerianlaw.com  
6 ADiBona@shegerianlaw.com

7 FOR DEFENDANTS:

8 MILLER BARONDESS, LLP  
9 BY: JASON H. TOKORO, ESQ.  
2121 Avenue of the Stars, Suite 2600  
Los Angeles, California 90067  
10 (310) 552-5226  
Jtokoro@millerbarondess.com  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

1 read the prior complaints against someone. I do not  
2 know, I can't speak to the level of research that a DCO  
3 will do going into prior histories.

4 Q. Okay. So it's up to the discretion of the DCO  
5 how deep they want to go into the prior history,  
6 correct?

7 A. Yes.

8 Q. Okay. When the assessment is happening, are you  
9 aware of a process where the complaint -- strike that.  
10 In which the complaint is made against the individual,  
11 are they notified at all during the process or no?

12 A. So are you asking if the involved parties are  
13 notified that the complaint has been filed against them  
14 or they have been made --

15 Q. Yeah.

16 A. -- an involved party in a complaint? Yes,  
17 that's part of our intake process is we would reach out  
18 via email to the effect to the unit of assignment of the  
19 involved party or parties and have the appropriate level  
20 of supervisor or command staff make a notification to  
21 them, we call them an admonishment, to the involved  
22 party that they have now been -- that the Policy of  
23 Equality complaint has been filed against them.

24 Q. When are they notified about the admonishment,  
25 is that after you finish the assessment or is that right

1 when you receive the complaint?

2 A. We send out that notification right -- you know,  
3 that's the final step in our generation of the  
4 complaint.

5 How long it may take a unit to get around to  
6 doing that, because part of that email there is a  
7 separate section we put in there, it's pretty  
8 standardized. It says, it's a paragraph that says:  
9 Admonishment. Please advise all parties that they have  
10 been named in the Policy of Equality, da da da.

11 The name of the involved party or parties is on  
12 page 2 of the POE report, which is always attached to  
13 that email. All right?

14 Q. Okay.

15 A. And they are advised to contact the ISU when  
16 that admonishment is created and to reference that  
17 particular POE complaint number that's been assigned so  
18 that we get word back and we know they have been  
19 admonished.

20 Q. We talked a lot about this, the different steps  
21 of the assessment process. Are there any steps that you  
22 haven't talked about yet?

23 A. No, I think we've pretty well covered them.

24 Q. Okay. Then to the best of your knowledge, do  
25 you have any idea how the office, the ISU conducts the

1 and they will give it to the sergeant.

2 I may step down to the office or send them an  
3 email saying, hey, I'm done with the assessment. But  
4 usually that process doesn't take very long to go from  
5 me over to the professional staff for database update  
6 and then forward to the sergeant for continued review.

7 Q. Okay. You say it won't take that long. Does it  
8 take like one day, a couple days?

9 A. If I'm handing it off at the end of the day,  
10 yeah, it will be the next business day. But if it's  
11 something that gets done, if I get it done in the  
12 morning the sergeant will have it that afternoon.

13 Q. Okay. So then it's fair to say then looking at  
14 these dates then you received it then the same day she  
15 received it --

16 A. That is correct.

17 Q. Okay. Perfect. Let me go up.

18 What's a classification mean?

19 A. Classification is the designation the ISU gives  
20 an Equity Complaint Assessment. We have four different  
21 classifications.

22 Q. And what do classifications mean? Is A the most  
23 egregious? I don't quite know.

24 A. A would be considered the most egregious,  
25 something that would contain sufficient information as

1 and they will give it to the sergeant.

2 I may step down to the office or send them an  
3 email saying, hey, I'm done with the assessment. But  
4 usually that process doesn't take very long to go from  
5 me over to the professional staff for database update  
6 and then forward to the sergeant for continued review.

7 Q. Okay. You say it won't take that long. Does it  
8 take like one day, a couple days?

9 A. If I'm handing it off at the end of the day,  
10 yeah, it will be the next business day. But if it's  
11 something that gets done, if I get it done in the  
12 morning the sergeant will have it that afternoon.

13 Q. Okay. So then it's fair to say then looking at  
14 these dates then you received it then the same day she  
15 received it --

16 A. That is correct.

17 Q. Okay. Perfect. Let me go up.

18 What's a classification mean?

19 A. Classification is the designation the ISU gives  
20 an Equity Complaint Assessment. We have four different  
21 classifications.

22 Q. And what do classifications mean? Is A the most  
23 egregious? I don't quite know.

24 A. A would be considered the most egregious,  
25 something that would contain sufficient information as



1 severity, egregiousness of the complaint to warrant  
2 further investigation by the Equity Investigation Unit.

3 Next in the classifications is a B  
4 classification. Those will be determined if there are  
5 equity issues. However, it's not -- the conduct is not  
6 egregious enough to warrant potential discipline. It's  
7 something that could be addressed by the appropriate  
8 unit level or administrative supervisor to deal with  
9 through like retraining, rebriefing, possibly like a  
10 performance log entry. Something of that nature.

11 A "C" complaint is that it has been determined  
12 that there is no proven equity issues or there is  
13 insufficient information provided to warrant -- to show  
14 any kind of a nexus between the alleged conduct and a  
15 protected bases, defined by the Policy of Equality.

16 Q. Is there a "D" rating?

17 A. There is no "D." The last one is an "N." Those  
18 are reserved for complaints that we get where the  
19 involved party is not a Sheriff's Department employee,  
20 or it's determined that the allegations are  
21 nonjurisdictional to the Sheriff's Department for the  
22 purposes of potential disciplinary action.

23 Q. And then if someone receives a complaint either  
24 A through N, would that be recorded anywhere in the  
25 record or personnel file or no?

1 Q. Okay. Then, to the best of your knowledge, do  
2 you know why for Exhibit No. 3 was classified as A?

3 A. I believe that in the course of her assessment  
4 in interviewing that Senior DCO Linda Vaisa determined  
5 that the conduct was pervasive or egregious enough to  
6 warrant further investigation by the Equity  
7 Investigation Unit.

8 Q. Okay. Let me double check one more thing.  
9 Let's see.

10 So I'm actually pretty much done. I'm going to  
11 double check my notes, check with Alex, see if I'm  
12 missing anything. But if you want to take a quick 10  
13 minute break and we can wrap up when we get back.

14 MR. TOKORO: Sounds good.

15 (Recess taken from 11:45 a.m. to 11:54 a.m.)

16 MS. SALINAS: Q. All right. Mr. Lested, I  
17 recall we're looking at the assessments, the  
18 classifications. The DCOs handled the classifications,  
19 correct?

20 A. Yes.

21 Q. Did you ever make an opinion about the  
22 classifications made by the DCOs?

23 A. No.

24 Q. And those who make the opinions about the  
25 classification, that would be the DCO and your sergeant;

1 is that correct?

2 A. The sergeants typically don't weigh in on what  
3 the designation should be either.

4 Q. Okay. Okay. So the designation is entirely  
5 decided by the DCO then, correct?

6 A. That's correct.

7 Q. All right. Well, that's all my questions. I  
8 will get the email, and then I will ask counsel  
9 questions for deponent, but I'm done for the day.

10 MR. TOKORO: Great. I do have some questions  
11 for Deputy Lested.

12 EXAMINATION BY MR. TOKORO

13 MR. TOKORO: Q. Deputy Lested, I just wanted to  
14 clarify something.

15 In connection with the Huntsman complaint,  
16 Mr. Villanueva was notified about that complaint,  
17 correct?

18 A. That's correct.

19 Q. He was, in fact, admonished on March 23rd of  
20 2022 in connection with the Huntsman complaint; is that  
21 right?

22 A. Yes.

23 Q. And he was also notified in connection with the  
24 Lim POE complaint, correct?

25 A. Correct.

1 Q. He has also admonished by Mr. Satterfield on  
2 March 23rd of 2022; is that right?

3 A. Yes.

4 Q. Okay. Now, you were asked a number of questions  
5 about the assessment done of Ms. Lim's complaint by DCO  
6 Vaisha. Do you agree with the assessment done by DCO  
7 Vaisha of giving it an A classification?

8 A. Yes.

9 Q. Did you believe based upon your review of the  
10 intake assessment form and POE complaint that the  
11 allegations against Mr. Villanueva were severe and  
12 egregious?

13 A. Yes.

14 Q. Now, you were also asked questions about DCO  
15 Sieberg's assessment of the Huntsman complaint. Now  
16 having reviewed the assessment form, do you agree with  
17 DCO Sieberg's assessment?

18 A. Yes.

19 Q. Do you agree with the assignment of the "A"  
20 classification for Mr. Huntsman's complaint?

21 A. Yes.

22 Q. Did you believe or do you believe that the  
23 allegations made against Mr. Villanueva were severe and  
24 egregious?

25 A. Yes.

1 Q. Okay. Now, I'd like to ask you a few things  
2 about some of the claims that Mr. Villanueva has made in  
3 this case. Specifically, Mr. Villanueva has claimed  
4 that the whole process relating to the Lim and Huntsman  
5 complaints were in retaliation for positions he took on  
6 issues before the Board of Supervisors. So I do want to  
7 ask you some of those questions.

8 Did Ballot Measure A have any involvement or be  
9 taken into consideration regarding the intake assessment  
10 for the Huntsman complaint?

11 A. No.

12 Q. Did it have any role or was it taken into  
13 consideration in assessment of the Lim complaint?

14 MS. SALINAS: Objection. Vague and ambiguous.

15 You may answer.

16 THE WITNESS: No.

17 MR. TOKORO: Q. Did Ballot Measure J have  
18 anything to do with the assessment of Mr. Huntsman's  
19 complaint?

20 MS. SALINAS: The same objections.

21 THE WITNESS: No.

22 MR. TOKORO: Q. Did Ballot Measure J have any  
23 role or was it considered in connection with the  
24 assessment of Ms. Lim's complaint?

25 MS. SALINAS: The same objections.

1 THE WITNESS: No.

2 MR. TOKORO: Q. Did Ballot Measure R, was that  
3 taken into consideration when assessing Mr. Huntsman's  
4 complaint?

5 MS. SALINAS: The same objections.

6 THE WITNESS: No.

7 MR. TOKORO: Q. Did Ballot Measure R, was that  
8 taken into account when assessing Ms. Lim's complaint?

9 MS. SALINAS: The same objections.

10 THE WITNESS: No.

11 MR. TOKORO: Q. Now, was Mr. Villanueva's  
12 opposition to any of these ballot measures considered  
13 when evaluating Mr. Huntsman's complaint?

14 A. No.

15 Q. Was Mr. Villanueva's opposition to these ballot  
16 measures considered when evaluating Ms. Lim's complaint?

17 MS. SALINAS: Objection. Vague and ambiguous.  
18 You may answer.

19 THE WITNESS: No.

20 MR. TOKORO: Q. Now, do you recall  
21 Mr. Villanueva publicly stating that he would not  
22 enforce the county's Covid vaccine mandate as to  
23 Department of Personnel?

24 A. Yes.

25 Q. Did Mr. Villanueva's refusal to enforce the

1 vaccine mandate play any role in ISU's assessment of  
2 Mr. Huntsman's complaint?

3 MS. SALINAS: Objection. Vague and ambiguous.  
4 You may answer.

5 THE WITNESS: No, it did not.

6 MR. TOKORO: Q. Did Mr. Villanueva's refusal to  
7 enforce the Covid vaccine mandate play any role in the  
8 ISU's assessment of Miss Lim's complaint?

9 MS. SALINAS: The same objections.

10 THE WITNESS: No.

11 MR. TOKORO: Q. Did Mr. Villanueva's opposition  
12 to the county's contract with Fulgent Genetics regarding  
13 Covid testing play any role in ISU's assessment of the  
14 Huntsman complaint?

15 MS. SALINAS: The same objections.

16 THE WITNESS: No.

17 MR. TOKORO: Q. Did Fulgent Genetics and its  
18 contract with the county play any role in the assessment  
19 of the Lim complaint?

20 MS. SALINAS: The same objections.

21 THE WITNESS: No.

22 MR. TOKORO: Q. Was the county Covid vaccine  
23 mandate discussed in any way, shape or form in  
24 connection with Mr. Huntsman's complaint?

25 MS. SALINAS: The same objections.

1 THE WITNESS: Not to my awareness.

2 MR. TOKORO: Q. Was the county's Covid vaccine  
3 mandate discussed in any way, shape or form in  
4 connection with assessing Miss Lim's complaint?

5 MS. SALINAS: The same objections.

6 THE WITNESS: No.

7 MR. TOKORO: Q. Was the Fulgent contract  
8 discussed in any way, shape or form in connection with  
9 assessing Mr. Huntman's complaint?

10 MS. SALINAS: The same objections.

11 THE WITNESS: No.

12 MR. TOKORO: Q. Was Fulgent discussed in any  
13 way, shape or form in connection with assessing  
14 Ms. Lim's complaint?

15 MS. SALINAS: The same objections.

16 THE WITNESS: No.

17 MR. TOKORO: Q. Now, you were asked a couple of  
18 questions and you gave the answer. I just want to make  
19 sure the record is clear.

20 Have you ever spoken with any member of the  
21 Board of Supervisors under any circumstance?

22 A. No.

23 Q. Have you ever spoken with Supervisor Solis?

24 A. No.

25 Q. Have you ever spoken with Supervisor Hahn?



1 A. No.

2 Q. Have you ever spoken with any member of the  
3 Board of Supervisors regarding the Huntsman complaint?

4 A. No.

5 Q. Have you ever spoken with any member of the  
6 Board of Supervisors regarding the Lim complaint?

7 A. No.

8 Q. Did you discuss the assessment of the Huntsman  
9 complaint with any member of the Board of Supervisors?

10 A. No.

11 Q. Did you discuss the assessment of the Lim  
12 complaint with any of the Board of Supervisors?

13 A. No.

14 Q. Now, I know this question may seem illogical  
15 given who was sheriff at the time, but I have to ask it  
16 because of the claims being made in this case.

17 At the time the assessment was being done in  
18 March, April of 2022 of the Huntsman complaint, did you  
19 have any conversations with Sheriff Luna about the  
20 assessment?

21 A. No.

22 Q. In fact, in March, April of 2022, Mr. Villanueva  
23 was still sheriff of the department, correct?

24 A. That's correct.

25 Q. Mr. Luna wasn't even a member of the department

1 at that time, correct?

2 A. Correct.

3 Q. So in March, April of 2022, did you have any  
4 discussions with Mr. Luna, with Sheriff Luna, about the  
5 assessment for the Lim complaint?

6 A. No.

7 Q. Have you ever at any time had a conversation  
8 with Sheriff Luna about the Huntsman complaint?

9 A. No.

10 Q. Have you ever at any time had a conversation  
11 with Sheriff Luna about the Lim complaint?

12 A. No.

13 Q. Have you ever had a conversation with Sheriff  
14 Luna at all?

15 A. I met Sheriff Luna one time.

16 Q. Okay. What was -- what were the circumstances  
17 surrounding you meeting him the one time?

18 A. He came by our office to introduce himself and  
19 to see who we were. You know, it was an introductory  
20 thing. Hi, I'm Sheriff Luna. We introduced ourselves  
21 to him, and that was it.

22 Q. Did he mention anything to you about the  
23 Huntsman complaint?

24 A. No.

25 Q. Did he mention anything to you about the Lim

1 complaint?

2 A. No.

3 Q. Since doing these assessments, have you been  
4 promoted by the department?

5 A. No.

6 Q. Now, one of the allegations that Mr. Villanueva  
7 has made in this case is that IAB or the county  
8 initially determined that the complaint filed by  
9 Mr. Huntsman, initially determined that Mr. Villanueva  
10 did not engage in any of the misconduct alleged by  
11 Mr. Huntsman. Did ISU ever make a determination that  
12 Mr. Villanueva did not engage in misconduct?

13 MS. SALINAS: Objection. Vague and ambiguous.  
14 Calls for a legal contention.

15 You may answer.

16 THE WITNESS: No.

17 MR. TOKORO: Q. Did the ISU ever determine that  
18 Mr. Villanueva had not violated department policy?

19 MS. SALINAS: The same objections.

20 THE WITNESS: No.

21 MR. TOKORO: Q. Did the ISU ever determine that  
22 Mr. Villanueva had not violated the department's Policy  
23 of Equality in connection with the Huntsman allegations?

24 MS. SALINAS: The same objections.

25 THE WITNESS: No.

1 MR. TOKORO: Q. In fact, ISU determined there  
2 was enough in the complaint that it should be subject to  
3 further administrative investigation, correct?

4 A. Correct.

5 Q. Did ISU ever determine that Mr. Villanueva did  
6 not engage in the misconduct alleged by Ms. Lim in her  
7 complaint?

8 A. No.

9 MS. SALINAS: The same objections.

10 MR. TOKORO: Did you get that, Wendy?

11 THE REPORTER: Yes.

12 MR. TOKORO: Q. Did the ISU ever determine that  
13 Mr. Villanueva did not violate department policy based  
14 upon the allegations made in Ms. Lim's complaint?

15 MS. SALINAS: The same objections.

16 THE WITNESS: No.

17 MR. TOKORO: Q. Did the department ever  
18 determine, or did the ISU specifically ever determine  
19 that Mr. Villanueva had not violated the department's  
20 Policy of Equality based upon the allegations in  
21 Ms. Lim's complaint?

22 MS. SALINAS: The same objections.

23 THE WITNESS: No.

24 MR. TOKORO: Q. In fact, the ISU determined  
25 that based upon the allegations in Ms. Lim's complaint

1 that there should be a further administrative  
2 investigation into Mr. Villanueva; is that correct?

3 A. That's correct.

4 Q. Now, one of the other things that Mr. Villanueva  
5 has alleged in this case is that these -- after a  
6 determination by the county or IAB that there was no  
7 misconduct, that these files, that these complaints were  
8 placed in a suspense file.

9 Did ISU ever place the Huntsman complaint into a  
10 suspense file?

11 MS. SALINAS: Objection. Assumes facts not in  
12 evidence. Calls for a legal contention. Vague and  
13 ambiguous.

14 You may answer.

15 THE WITNESS: No.

16 MR. TOKORO: Q. Did ISU ever place the Lim  
17 complaint in a suspension file?

18 MS. SALINAS: The same objections.

19 THE WITNESS: No.

20 MR. TOKORO: Q. Have you ever heard of  
21 something called a suspense file at the department?

22 A. I have never heard of that term before.

23 Q. Have you ever heard of a suspense file used by  
24 the ISU for complaints, POE complaints?

25 A. No.

1 Q. Have you ever heard of a suspense file within  
2 the Internal Affairs Bureau at the department for POE  
3 complaints?

4 A. No.

5 Q. So just to be clear, have you ever heard of a  
6 suspense file for any unit or division of the Sheriff's  
7 Department?

8 A. No.

9 MR. TOKORO: That's all I have got.

10 MS. SALINAS: I have one more follow up.

11 FURTHER EXAMINATION BY MS. SALINAS

12 MS. SALINAS: Q. To the best of your knowledge,  
13 Mr. Lested, who handled the disciplining of individuals  
14 in which complaints were made against, which department  
15 handles that?

16 A. When you say "department," are you talking a  
17 specific unit within the Sheriff's Department?

18 Q. Yes.

19 A. It would be -- discipline would be handled by  
20 the appropriate administrative supervisor for the  
21 involved party.

22 Q. Got it. And to the best of your knowledge in  
23 your department did you handle -- do you handle  
24 admonishments or do you provide recommendations who  
25 should provide the admonishments?

LESTED, JONATHAN

Page 74

1 I have read the foregoing deposition  
2 transcript and by signing hereafter, subject to  
3 any changes I have made, approve same.

4  
5 Dated April 17, 2025.

6  
7  
8   
9 JONATHAN LESTED

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

1 STATE OF CALIFORNIA )

2 COUNTY OF LOS ANGELES )

3 I, WENDY L. GRAVES, CSR, hereby certify that the  
4 witness in the foregoing deposition named JONATHAN  
5 LESTED was by me duly sworn to tell the truth, the whole  
6 truth, and nothing but the truth in the within-entitled  
7 cause; that said deposition was taken at the time and  
8 place therein stated; that the testimony of said witness  
9 was reported by me in shorthand writing and was  
10 thereafter transcribed by computer under my direction;  
11 that the foregoing is a full, complete, and true record  
12 of said testimony; and that the witness was given an  
13 opportunity to read and correct said deposition and to  
14 subscribe the same.

15 I further certify that I am not of counsel or  
16 attorney for any of the parties in the foregoing  
17 deposition or in any way interested in the outcome of  
18 the cause named in said caption.

19 IN WITNESS WHEREOF, I have hereunto set my hand  
20 this 17th day of April, 2025.

21

22

23

24

25



WENDY L. GRAVES, CSR NO. 6138

STATE OF CALIFORNIA



# EXHIBIT 17

**CERTIFIED COPY**

**Express Deposition Services**



by EXPRESSNETWORK

1605 W. Olympic Blvd., Suite 800 Los Angeles, CA 90015

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ALEX VILLANUEVA vs COUNTY OF LOS ANGELES

NAIRI GEVORKI

April 15, 2025

CHRISTI KAISER, CSR No. 5983, Job No. 7555

1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION  
3  
4 CASE NO. 2:24-cv-04979 SVW (JCx)

5 ALEX VILLANUEVA, )  
6 Plaintiff, )  
7 vs. )  
8 COUNTY OF LOS ANGELES, )  
9 COUNTY OF LOS ANGELES )  
10 SHERIFF'S DEPARTMENT, LOS )  
11 ANGELES COUNTY BOARD OF )  
12 SUPERVISORS, COUNTY EQUITY )  
13 OVERSIGHT PANEL, LOS )  
14 ANGELES COUNTY OFFICE OF )  
15 INSPECTOR GENERAL, )  
CONSTANCE KOMOROSKI, )  
16 MERCEDES CRUZ, ROBERTA )  
17 YANG, LAURA LECRIVAIN, )  
18 SERGIO V. ESCOBEDO, RON )  
19 KOPPERUD, ROBERT G. LUNA, )  
20 MAX-GUSTAF HUNTSMAN, )  
21 ESTHER LIM, and DOES 1 to 100, )  
22 )

23 ZOOM VIDEO CONFERENCE DEPOSITION

24 DEPOSITION OF: NAIRI GEVORKI  
25 DATE AND TIME: TUESDAY, APRIL 15, 2025  
10:00 A.M. - 11:15 A.M.  
26 LOCATION: LOS ANGELES, CALIFORNIA  
27  
28 COURT REPORTER: CHRISTI KAISER, CSR (VIA ZOOM)  
29 CERTIFICATE NO. 5983  
30 JOB #7555

GEVORKI, NAIRI

Page 2

1 REMOTE APPEARANCES OF COUNSEL

2

3 FOR THE PLAINTIFF ALEX VILLANUEVA:

4 SHEGERIAN & ASSOCIATES, INC.

BY: ALEX DIBONA, ESQ.

5 11520 San Vicente Boulevard

Los Angeles, California 90049

6 Telephone Number: (310) 860 0770

Facsimile Number: (310) 860 0771

7 E-mail: ADiBona@shegerianlaw.com

8

9

FOR THE DEFENDANTS:

10

MILLER BARONDESS, LLP

11 BY: JASON H. TOKORO, ESQ.

2121 Avenue of the Stars, Suite 2600

12 Los Angeles, California 90067

E-mail: jtokoro@millerbarondess.com

13

14

15

16

17

18

19

20

21

22

23

24

25

GEVORKI, NAIRI

Page 30

1 Do you see that there?

2 A. Correct, yes.

3 Q. Let me just back up for a moment.

4 In your unit are you only dealing with County  
5 employees?

6 A. Can you elaborate what you mean by that or  
7 clarify. I'm sorry.

8 Q. The people who are filing complaints that come  
9 to you in your current role, those are all employees by  
10 the County of Los Angeles.

11 Is that fair to say?

12 MR. TOKORO: Objection. Assumes facts.

13 THE WITNESS: No.

14 BY MR. DIBONA:

15 Q. Who, besides employees of the County of Los  
16 Angeles, would file complaints that you would be  
17 involved in assessing in your current role?

18 A. A member of the public. For example it could  
19 be a client or a participant of the County department.

20 Q. What does it mean in this context to be  
21 unrelated to County employment?

22 A. That it does not relate to one of the County  
23 departments that's under the jurisdiction of the County  
24 Policy of Equity.

25 Q. And by the way, are there County departments

1 that are not under the jurisdiction of the Policy of  
2 Equity?

3 A. Yes.

4 Q. What are those departments?

5 A. I know the Sheriff's Department.

6 I don't know if there are others.

7 Q. And do you have an understanding as to why the  
8 Sheriff's Department is not under that?

9 A. Because they have their own investigative body  
10 or unit for those types of complaints.

11 Q. And what does it mean to be non-jurisdictional  
12 to the CPOE?

13 A. That it's not something that we investigate.

14 Q. And it may be in your previous answer, but how  
15 do you decide what's not something you investigate?

16 A. If it's -- so it depends. It depends on.

17 Can I kind of elaborate just a couple of  
18 things?

19 Q. Of course.

20 A. If it is an allegation against like a  
21 Sheriff's Department employee then that will be  
22 considered an N designation or non-jurisdictional.  
23 Could also be non-jurisdictional if it is a client or  
24 participant of a County department making allegations  
25 against that department's employee. It may be

GEVORKI, NAIRI

Page 32

1 non-jurisdictional because the department is required to  
2 investigate.

3 So it depends.

4 Q. And the E designation "Indicates that the  
5 initial intake investigation reveals that a  
6 discrimination, harassment, and/or retaliation complaint  
7 was received by the County from an external agency such  
8 as the California Department of Fair Employment and  
9 Housing (DFEH), and/or from the Federal Equal Employment  
10 Opportunity Commission (EEOC) and will now be assessed  
11 internally at the County for appropriate  
12 handling/designation."

13 Do you see that there?

14 A. Yes.

15 Q. And that I believe that that may be obvious in  
16 context, but is that your understanding of how you apply  
17 an E designation?

18 A. Yes.

19 Q. And at least in this document this is -- you  
20 see your name here?

21 A. Yes.

22 Q. And there is mention of a CEOP panelist Angela  
23 Reddock-Wright.

24 Do you see her name?

25 A. Yes.

GEVORKI, NAIRI

Page 36

1 Q. Under Protected Basis it says "None Alleged."

2 Do you see that?

3 A. Yes.

4 Q. What does it mean to say "None Alleged" in the  
5 context of a Protected Basis?

6 A. They're alleging that they were somehow in  
7 this case retaliated against. But they're not alleging  
8 that it was due to a Protected Basis under the CPOE or  
9 County Policy of Equity. I'm sorry.

10 Q. And the overall designation for each of those  
11 charges is N, correct?

12 A. Correct.

13 Q. And there may be a different reason but let me  
14 just -- in the interest of saving time, what's the  
15 reason for the N designation for these charges?

16 A. The Involved Parties status as a Sheriff's  
17 Department employee or head of Sheriff's Department.

18 Q. And it may be obvious, but can you explain why  
19 it's an N designation because it involved the Sheriff's  
20 Department?

21 A. Because they have their own investigation body  
22 or unit for these types of complaints.

23 Q. In this instance what happens to the  
24 complaint?

25 A. I believe it's referred to the Sheriff's



GEVORKI, NAIRI

Page 37

1 Department to do an investigation or to look into the  
2 allegations.

3 Q. And did you yourself forward this complaint to  
4 the Sheriff's Department?

5 A. I don't think so, no.

6 Q. Is it your understanding that someone in your  
7 unit would do that?

8 A. I would think so, yes.

9 Q. And were you involved in any way in what the  
10 Sheriff's Department did with the complaint?

11 A. No.

12 Q. And were you at some point in time did you  
13 learn that the CEOP had issued a Do Not Rehire  
14 designation for or that was placed in Sheriff  
15 Villanueva's personnel file?

16 A. No.

17 Q. Is it fair to say that you didn't have any  
18 role in placing that designation on his file?

19 A. That's correct.

20 Q. Were you aware that the LA Times wrote about  
21 the placement of the Do Not Rehire notation in Sheriff  
22 Villanueva's file?

23 A. No.

24 Q. Because you didn't know, is it fair to say no  
25 reporter from the LA Times has contacted you about

GEVORKI, NAIRI

Page 42

1 Q. I don't have any further questions.

2 Do you, Counsel?

3 MR. TOKORO: I do. Thank you. And Christi just  
4 as a reminder from earlier and through all the things  
5 that we've gone through already if you have any trouble  
6 hearing me just let me know. I'm going to do my best to  
7 speak loudly and get as close to the microphone as  
8 possible.

9 THE COURT REPORTER: Thank you.

10 EXAMINATION

11 BY MR. TOKORO:

12 Q. Ms. Gevorki, do you stand by the testimony  
13 that you gave for the assessment of the Lim complaint?

14 A. Yes.

15 Q. Do you stand by the assessment that you did  
16 for the Huntsman complaint?

17 A. Yes.

18 Q. Did you talk to any member of the Board of  
19 Supervisors in connection with the Lim complaint?

20 A. No.

21 Q. Did you talk to any member of the Board of  
22 Supervisors in connection with the Huntsman complaint?

23 A. No.

24 Q. Did you talk to Supervisor Solis about the  
25 Huntsman or the Lim complaint?

1 A. No.

2 Q. Did you talk to Supervisor Hahn about the  
3 Huntsman or the Lim complaint?

4 A. No.

5 Q. Did you or have you ever spoken to any member  
6 of the Board of Supervisors for any reason?

7 A. Yes.

8 Q. Okay. Anything related to either of these  
9 complaints?

10 A. No.

11 Q. Have you ever spoken with Sheriff Luna about  
12 the Lim complaint?

13 A. No.

14 Q. Have you ever spoken with Sheriff Luna about  
15 the Huntsman complaint?

16 A. No.

17 Q. Have you ever spoken with Sheriff Luna about  
18 the assessment that you gave for either the Lim or  
19 Huntsman complaints?

20 A. No.

21 Q. Now, Mr. Villanueva has alleged in this case  
22 that the investigations that were conducted into these  
23 complaints were in retaliation for positions he took on  
24 let's just say political issues. So I want to ask you  
25 about those now.

GEVORKI, NAIRI

Page 44

1 Do you know what Ballot Measure A is?

2 A. No.

3 Q. Did Ballot Measure A have anything to do with  
4 the assessment that you did for the Huntsman or Lim  
5 complaints?

6 A. No.

7 MR. DIBONA: Object to form. You may answer  
8 BY MR. TOKORO:

9 Q. Do you know what Ballot Measure J is?

10 A. No.

11 Q. Did Ballot Measure J have anything to do with  
12 your assessment of the Lim complaint?

13 MR. DIBONA: Object to form.

14 THE WITNESS: No.

15 BY MR. TOKORO:

16 Q. Did it have anything to do with your  
17 assessment of the Huntsman complaint?

18 MR. DIBONA: Object to form.

19 THE WITNESS: No.

20 BY MR. TOKORO:

21 Q. Do you know what Ballot R is?

22 A. No.

23 Q. Did Ballot Measure R have anything to do with  
24 your assessment of the Lim complaint?

25 MR. DIBONA: Object to form.

1 THE WITNESS: No.

2 BY MR. TOKORO:

3 Q. Did Ballot Measure R have anything to do with  
4 your assessment of the Huntsman complaint?

5 MR. DIBONA: Object to form.

6 THE WITNESS: No.

7 BY MR. TOKORO:

8 Q. Now, we know about the COVID vaccine mandate?

9 A. Yes.

10 Q. Does the County COVID Mandate have anything to  
11 do with your assessment of the Lim complaint?

12 A. No.

13 MR. DIBONA: Object to form.

14 BY MR. TOKORO:

15 Q. Did the County COVID Vaccine mandate have  
16 anything to do with your assessment of the Huntsman  
17 complaint?

18 MR. DIBONA: Object to form.

19 THE WITNESS: No.

20 BY MR. TOKORO:

21 Q. Do you know what Mr. Villanueva's position was  
22 on the County's COVID Vaccine Mandate?

23 A. No.

24 Q. Did Mr. Villanueva's position on the COVID  
25 Vaccine Mandate have anything to do with your assessment

GEVORKI, NAIRI

Page 46

1 of the Lim or Huntsman complaints?

2 A. No.

3 MR. DIBONA: Object to form.

4 THE WITNESS: No.

5 BY MR. TOKORO:

6 Q. Have you ever heard of a contract between the  
7 County and Fulgent Genetics?

8 A. Yes.

9 Q. Are you aware that the County had a contract  
10 with Fulgent to do COVID testing?

11 A. Yes.

12 Q. Did that contract have anything to do with  
13 your assessment of the Lim complaint?

14 A. No.

15 Q. Did that contract have anything to do with  
16 your assessment of the Huntsman complaint?

17 MR. DIBONA: Object to form.

18 THE WITNESS: No.

19 BY MR. TOKORO:

20 Q. Do you know what Mr. Villanueva's position was  
21 on the Fulgent contract?

22 A. No.

23 Q. Did Mr. Villanueva's position on the Fulgent  
24 contract have anything to do with your assessment?

25 A. No.

GEVORKI, NAIRI

Page 47

1 MR. DIBONA: Object to form.

2 THE WITNESS: No.

3 BY MR. TOKORO:

4 Q. Now, Mr. Villanueva has alleged in this case  
5 that the County initially determined that he had not  
6 engaged in misconduct and that he had not committed a  
7 policy violation. I want to talk about the Lim  
8 complaint first.

9 Did you determine that Mr. Villanueva had not  
10 engaged in the misconduct alleged by Ms. Lim?

11 A. No.

12 Q. Did you determine that Mr. Villanueva had not  
13 violated County policy by the conduct alleged by  
14 Ms. Lim?

15 A. No.

16 Q. Did you determine that Mr. Villanueva had not  
17 violated the County Policy of Equity by the conduct  
18 alleged by Ms. Lim?

19 A. No.

20 Q. Did you determine that Mr. Villanueva did not  
21 violate the department's Policy of Equality by the  
22 conduct alleged by Ms. Lim?

23 A. No.

24 Q. Now, I want to talk about the Huntsman  
25 complaint. Did you ever determine that Mr. Villanueva

GEVORKI, NAIRI

Page 48

1 had not engaged in the misconduct alleged by  
2 Mr. Huntsman?

3 A. No.

4 Q. Did you ever determine that Mr. Villanueva had  
5 not violated County policy by the conduct alleged by  
6 Mr. Huntsman?

7 A. No.

8 Q. Did you ever determine that Mr. Villanueva did  
9 not violate the County's Policy of Equity out of conduct  
10 alleged by Mr. Huntsman?

11 A. No.

12 Q. Did you ever determine that Mr. Villanueva did  
13 not violate the department's Policy of Equality by the  
14 conduct alleged by Mr. Huntsman?

15 A. No.

16 Q. Now, you gave some testimony earlier about why  
17 you assigned the two complaints the N designation.

18 Do you remember those questions?

19 A. Yes.

20 Q. I just want to make sure that the record is  
21 clear. The reason you designated the Lim complaint N  
22 was because Mr. Villanueva was a member of the Sheriff's  
23 Department.

24 Is that correct?

25 A. Yes.



GEVORKI, NAIRI

Page 49

1 MR. DIBONA: Object to form.

2 BY MR. TOKORO:

3 Q. And the same goes for the Huntsman complaint.

4 Is that correct?

5 MR. DIBONA: Object to form.

6 THE WITNESS: Yes.

7 BY MR. TOKORO:

8 Q. You designated it N because you understood

9 Mr. Villanueva was the head of Sheriff's Department.

10 Is that right?

11 A. Yes.

12 Q. And as the head of Sheriff's Department does  
13 the CISU have jurisdiction over Mr. Villanueva?

14 A. No.

15 Q. And I believe you testified about this earlier  
16 but I think you said the reason for that is that the  
17 department has its own policy of equality.

18 Is that right?

19 A. Yes.

20 MR. DIBONA: Object to form.

21 BY MR. TOKORO:

22 Q. And the Sheriff's Department also had its own  
23 Intake Specialist Unit, correct?

24 A. Yes.

25 MR. DIBONA: Object to form.

GEVORKI, NAIRI

Page 51

1 BY MR. TOKORO:

2 Q. Okay. Now, Mr. Villanueva has also alleged  
3 that at some point in time the Lim complaint and the  
4 Huntsman complaint were placed in a Suspense File. I  
5 want to ask you about that.

6 Is there any such thing as a Suspense File in  
7 the County Intake Specialist Unit?

8 A. I've never heard of that.

9 Q. At any point in time did you place the Lim  
10 complaint in a Suspense File?

11 A. No.

12 Q. At any point in time did you place the  
13 Huntsman complaint in a Suspense File?

14 A. No.

15 Q. Thank you. No other questions.

16 MR. DIBONA: Just a couple of followup  
17 questions.

18 FURTHER EXAMINATION

19 BY MR. DIBONA:

20 Q. Did you determine -- for Esther Lim did you  
21 determine that Sheriff Villanueva had committed any  
22 Policy of Equity Violations?

23 A. No.

24 Q. Or Max Lim. Did you determine that Sheriff  
25 Villanueva had committed any Policy of Equity

GEVORKI, NAIRI

Page 55

1 CERTIFICATE OF CERTIFIED SHORTHAND REPORTER

2

3 I, CHRISTI KAISER, CERTIFIED SHORTHAND REPORTER  
4 IN AND FOR THE STATE OF CALIFORNIA, CSR NO. 5983, do  
5 hereby certify:

6 That the foregoing deposition of the witness  
7 therein named was taken remotely at the time and place  
8 therein set forth, at which time the witness was put  
9 under oath by me via Zoom Teleconference;

10 That the testimony of the witness and all  
11 objections made at the time of the examination were  
12 recorded stenographically by me and were thereafter  
13 transcribed;

14 That the foregoing deposition is a true record of  
15 the testimony and all objections made at the time of the  
16 examination.

17

18 IN WITNESS WHEREOF, I have subscribed my name  
19 this 16th day of April, 2025.

20

21

22

*Christi Kaiser*

23

CHRISTI KAISER, CSR

24

CERTIFICATE NO. 5983

25

Express Deposition Services - Scheduling@expressdeposition.com  
(888)286-4226

# EXHIBIT 18

For CISU Use:
(Method of Receipt)
<input type="checkbox"/> Telephone
<input type="checkbox"/> In-Person
<input checked="" type="checkbox"/> Online
<input type="checkbox"/> Paper Complaint
Reference
#2019-0016591
#2022-112209

## COUNTY POLICY OF EQUITY

### REPORT/NOTIFICATION FORM

#### Methods of Reporting Potential County Policy of Equity (CPOE) Violations:

- 1) You may use this form to report a potential violation of the CPOE;
- 2) File an online complaint at <https://ceop.bos.lacounty.gov> (strongly encouraged);
- 3) Call the County Intake Specialist Unit (CISU) at (855) 999-CEOP (2367); or
- 4) Visit the CISU office at the Kenneth Hahn Hall of Administration building located at 500 West Temple Street, Suite B-26, Los Angeles, CA 90012.

---

#### 1. Do you wish to file this complaint anonymously?

No

#### 2. Are you filing this complaint for:

Yourself

---

**(Note to Supervisors/Managers:** As a County Manager/Supervisor, it is the County's expectation that the CPOE complaint notification be submitted online at <https://ceop.lacounty.gov>).

#### Section A: Reporting Party Information

Today's Date: 3/8/2022

Name: Esther Lim

Emp. #: e662896

Title: Justice Deputy

Email: elim@bos.lacounty.gov

Work #: (213) 458-1795

Mobile #: [REDACTED]

Work Hrs.:

RDO:

Reporting Party's Department: BOARD OF SUPERVISORS

Dept. Head: Celia Zavala

Reporting Party's Other Department:

**Reporting Party's Unit of Assignment:** Board of Supervisors, Hilda L. Solis

**Reporting Party's Work Address:** 500 West Temple Street Los Angeles, CA 90012

**Reporting Party's Immediate Supervisor:** Cindy Chen

**Date & Time Form Completed:** 2022-03-08 21:28:13

**Did the complainant notify a supervisor/manager of this complaint prior to now?**

Yes

**Name of Supervisor/Manager Notified:** Cindy Chen

**Date:** 2022-03-08 15:32:00

**How:** Email

---

**Section B: Complainant(s) Information**

1.

**Name:** Esther Lim

**Emp. #:** e662896

**Title:** Justice Deputy

**Work #:** 2134581795

**Mobile #:** [REDACTED]

**Work Hrs.:**

**RDO:**

**Complainant's Department:** BOARD OF SUPERVISORS **Dept. Head:**

**Complainant's Other Department:**

**Complainant's Unit of Assignment:** Board of Supervisors, Hilda L. Solis

**Complainant's Work Address:**

**Complainant's Immediate Supervisor:** Cindy Chen

**Section C: Alleged Involved Party(ies) Information**

**1.**

**Name:** Alex Villanueva

**Emp. #:**

**Title:** Sheriff

**Work #:**

**Mobile #:**

**Work Hrs.:**

**RDO:**

**Involved Party's Department:** SHERIFF

**Dept. Head:**

**Involved Party's Other Department:**

**Involved Party's Unit of Assignment:** LA Sheriff's Department

**Involved Party's Work Address:**

**Involved Party's Immediate Supervisor:** Alex Villanueva

**Section D: Alleged Witness(es) Information (if they can be identified)**

1.

**Name:** Veronica Pawlowski**Emp. #:** e552095**Title:** Senior Justice Deputy**Work #:****Mobile #:** [REDACTED]**Work Hrs.:****RDO:****Witness's Department:** BOARD OF SUPERVISORS**Dept. Head:****Witness's Other Department:****Witness's Unit of Assignment:** Supervisor Sheila Kuehl**Witness's Work Address:****Witness's Immediate Supervisor:** Lisa Mandel

2.

**Name:** Kyla Coates**Emp. #:** e656300**Title:** Justice and Health Deputy**Work #:****Mobile #:** [REDACTED]**Work Hrs.:****RDO:****Witness's Department:** BOARD OF SUPERVISORS**Dept. Head:****Witness's Other Department:****Witness's Unit of Assignment:** Supervisor Janice Hahn**Witness's Work Address:****Witness's Immediate Supervisor:** Gerardo Pinedo

3.

**Name:** Max Huntsman**Emp. #:** e410745**Title:** Inspector General**Work #:****Mobile #:** [REDACTED]**Work Hrs.:****RDO:****Witness's Department:** OTHER**Dept. Head:****Witness's Other Department:** Office of Inspector General**Witness's Unit of Assignment:** Office of Inspector General**Witness's Work Address:****Witness's Immediate Supervisor:**



**Section E: Nature of Complaint or Issue(s)**

**1. What is the date of the alleged potential violation(s)?:** 07/28/2021

**2. Please provide a detailed summary of the alleged potential violation(s):**

I have four examples. Please see attached letter for additional information.

On July 28, 2021, Sheriff Villanueva, while in uniform, went on Facebook Live and said, "I don't think the public realizes, when [the Board of Supervisors] write these motions, these are written by their Justice Deputies, who are some 20-something, woke individuals, who are basically putting in words what doesn't pass legal muster at all."

On October 6, 2021, during a Facebook Live, Sheriff Villanueva said, "You hear me loud and clear now because if you're not watching their entire thing, I'm pretty sure your flunkies are going to listen to the whole thing and report back to you." When he uses the term "flunkies" he is pejoratively describing me to malign me and minimize my job as Justice Deputy.

On February 16, 2022, Sheriff Villanueva during a community town hall for the South Bay cities, said that "All the Supervisors have 25-year-old justice deputies who are right out of college and writing all their motions." This comment was made in front of the public and County staff. This is another example of Sheriff Villanueva discriminating against me based on age.

Fourth incident is on 3/22/22

**3. Why does the Complainant(s) believe the treatment occurred/is occurring?:**

Though the comments are made generally about the Justice Deputies, the attack was specifically lodged against me because Sheriff Villanueva is seen in the Facebook Live, holding a hard copy of the motion Supervisor Solis put forward on July 27, 2021 titled, "Taking Action: Further Protections for Surviving Families from Law Enforcement Harassment and Retaliation." The motion he was holding and reading from is one I worked on behalf of Supervisor Solis.

Given Sheriff Villanueva's documented history of intimidation and harassment of women and women of color, as the first, second generation Korean American woman to serve as Justice Deputy and the only Asian Justice Deputy, currently on staff, I believe Sheriff Villanueva is unfairly targeting me, as shown in the July 28, 2021 example.

I am also aware he has targeted, intimidated, and harassed another Asian woman and LA County employee, former Chief Executive Officer, Sachi Hamai.

Additionally, it behooves me that as an Asian woman I need to speak up during a time in which anti-Asian hate is at its all-time peak, due to ignorant, racist, and hateful comments about the cause of the COVID-19 pandemic that has led...

---

**Section F: TO BE COMPLETED BY SUPERVISORS/MANAGERS ONLY**

**Date supervisor/manager observed and/or was notified of the alleged potential violation(s):**

How was supervisor/manager made aware of the alleged potential violation(s)? (Explain in detail):

What action(s), if any, did the supervisor/manager take? (Explain in detail):

Did the supervisor/manager ascertain whether Complainant(s) is/are in need of any of the following?

Medical Attention:

Protection:

Separation from Alleged Involved Party(ies):

Other Assistance:

---

Did the supervisor/manager advise the Complainant(s) that they:

May seek confidential counseling or assistance from the County's Employee Assistance Program (EAP) at (213) 738-4200:

May contact the County Intake Specialist Unit (CISU) directly at (855)-999-2367, or via email at ceop@bos.lacounty.gov:

**OPTIONAL:** Please provide the information below for statistical purposes only

**Race/Ethnicity:** Asian (Not Hispanic or Latino)

"The employer is subject to certain governmental recordkeeping and reporting requirements for the administration of civil rights laws and regulations. In order to comply with these laws, the employer invites employees to voluntarily self-identify their race or ethnicity. Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment. The information obtained will be kept confidential and may only be used in accordance with the provisions of applicable laws, executive orders, and regulations, including those that require the information to be summarized and reported to the federal government for civil rights enforcement. When reported, data will not identify any specific individual." - (eeoc.gov)

**Sex:** Female

**Date Of Birth:** 1981-07-30

# EXHIBIT 19

**CISU ASSESSMENT FORM**

ICMS Number(s): 2022-112209	Final Overall Designation
Date CISU Received: March 8, 2022	<input type="checkbox"/> "A"
Sworn Personnel: None	<input type="checkbox"/> "B"
Approximate Statute Date: N/A	<input type="checkbox"/> "C"
	<input checked="" type="checkbox"/> "N"
	<input type="checkbox"/> "E"

**Reporting Party(ies)**

Esther Lim, e662896, BOARD OF SUPERVISORS, Justice Deputy

**Complainant(s):**

ESTHER LIM, e662896, BOARD OF SUPERVISORS, SUPERVISOR'S DEPUTY III,  
UNCLASSIFIED

**Involved Party(ies):**

ALEJANDRO VILLANUEVA, e246296, SHERIFF, SHERIFF/UNCLASSIFIED

**Persons Interviewed**

**Assessment**

CP Lim (Female/Asian; DOB 7/30/1981; 40 years of age) alleges that IP Villanueva (Male/Hispanic or Latino; DOB 02/25/1963/59 years of age) has discriminated against and harassed CP based on age, sex, and race, and retaliated against CP. CP also alleges IP has engaged in "third-party harassment." CP provided four examples of the IP's alleged conduct. CP contends that in a "Facebook Live" appearance on 7/28/2021 IP Villanueva stated, "I don't think the public realizes, when [the Board of Supervisors] write these motions, these are written by their Justice Deputies, who are some 20-something, woke individuals, who are basically putting in words what doesn't pass legal muster at all." CP contends that while the statement was made generally about all Justice Deputies it was directed more specifically at CP because the motion IP Villanueva referenced was one CP drafted or helped draft.

CP alleges that in another "Facebook Live" on 10/6/2021 IP Villanueva referred to Justice Deputies as "flunkies." CP alleged that in a town hall on 2/16/2022 the IP stated, "All the Supervisors have 25-year-old justice deputies who are right out of college and writing all their motions." CP alleged, "This is another example of Sheriff Villanueva discriminating against me based on age." Lastly, CP alleged that in a 3/2/2022 "Facebook Live" appearance the IP stated there are "[n]o male justice deputy staff" and that "The people they hire are all 20 something fresh out of college. Don't have a lot of senior people. Woke flunkies straight out of college. First job. That's who writes the nonsense board orders." CP asserts CP has "sincere concerns" for CP's safety and that of CP's "peers."

IP Villanueva is the Los Angeles County Sheriff. The Sheriff's Department has its own equity process by which it internally addresses such complaints. Therefore, the facts alleged, even if taken as true, are unrelated to County employment or are otherwise non-jurisdictional under the County Policy of Equity. The County Intake Specialist Unit recommends an "N" designation for ICMS No. 2022-112209 and that the Sheriff's Department consider conducting an independent inquiry into the matter.

**Designation**

Based on the information contained in the Report Notification Form(s) and any data indicated on this intake assessment form and/or additional information, it has been determined that this complaint is designated as follows:

**Involved Party** ALEJANDRO VILLANUEVA, e246296, SHERIFF

Overall Designation: **N**

CP	Charge	Protected Basis	Designation
ESTHER LIM	Sec. 6 Retaliation	None Alleged	N
ESTHER LIM	Sec. 3 Harassment	Gender	N
ESTHER LIM	Sec. 1 Discrimination	Age (40+)	N
ESTHER LIM	Sec. 5 Inappropriate Conduct Towards Others	Race	N
ESTHER LIM	Sec. 4 Third - Person Harassment	Age (40+)	N
ESTHER LIM	Sec. 1 Discrimination	Gender	N
ESTHER LIM	Sec. 3 Harassment	Race	N
ESTHER LIM	Sec. 3 Harassment	Age (40+)	N
ESTHER LIM	Sec. 1 Discrimination	Race	N
ESTHER LIM	Sec. 5 Inappropriate Conduct Towards Others	Gender	N
ESTHER LIM	Sec. 5 Inappropriate Conduct Towards Others	Age (40+)	N

**Designation definitions**

**"A" designation.** CISU has concluded that **facts alleged present a potential violation** of the County Policy Of Equity (CPOE), which could warrant discipline (written warning, suspension, or discharge) and therefore further investigation by the County Equity Investigations Unit (CEIU) is recommended. (Reasonable good faith belief standard).

**"B" designation.** CISU has concluded that although the situation may involve, or appear to involve, an equity issue, **the situation does not rise to the level of a potential violation** of the CPOE, which could warrant discipline (written warning, suspension, or discharge). (Reasonable good faith belief standard).

**"C" designation.** CISU has concluded that **the facts alleged, even if taken as true, are not jurisdictional** to the CPOE. (Reasonable good faith belief standard).

**"N" designation.** CISU has concluded that the facts alleged, even if taken as true, are unrelated to County employment or otherwise non-jurisdictional to the CPOE. (Reasonable good faith belief standard).

**"E" designation.** Indicates that the initial intake investigation reveals that a discrimination, harassment, and/or retaliation complaint was received by the County from an external agency, such as the California Department of Fair Employment and Housing (DFEH), and/or from the Federal Equal Employment Opportunity Commission (EEOC) and will now be assessed internally at the County for appropriate handling/designation. (Reasonable good faith belief standard).

**Administrative Process Disclaimer:** The analysis contained herein, including the terminology used, is the result of an administrative process and initial investigation under the County Policy of Equity. The standards of proof and rules governing administrative investigatory and disciplinary processes are different from those that govern court proceedings. No legal conclusions can or should be drawn from this administrative analysis or the terminology contained therein and such would not be appropriate for consideration in any legal proceeding or court of law.

**Confidentiality Notice and Disclaimer:** This document may contain confidential and privileged information and is solely for the use of the person(s) or entity to whom it is intended. Any unauthorized review, use, disclosure, or distribution is prohibited.

Assessed by CISU Investigator: Nairi Gevorki

Reviewed by CEOP Panelist: Angela Reddock-Wright

Second Opinion Name:

CISU Investigation Complete Date: March 21, 2022

# EXHIBIT 20

**For I.S.U. Use Only**  
Method of Receipt  
☐ Telephone  
☐ In Person  
☐ POE Report Form  
☒ Other: CPOE  
Intake # 22-046

## Policy of Equality Report / Notification Form

**General Instructions:** Use this form to report a potential violation of the Policy of Equality. Non-supervisors may also report a potential violation of the Policy of Equality by calling the Intake Specialist Unit at (323) 890-5371 or visiting them at 4900 S. Eastern Avenue, Suite 203, Commerce.

Section A: Reporting Party Information

Today's Date: 03 / 17 / 2022

Name: Esther Lim Emp. #. 662896 Rank/Title Justice Deputy

Work Tel# 213-458-1795 ; Home Tel# [REDACTED] ; Work Hours - RDO

Unit of Assignment: Board Of Supervisors Office Unit Commander: Supervisor Hilda Solis

Division LA County Board of Supervisors

Name of Supervisor Completing this form (if different from above): \_\_\_\_\_ # \_\_\_\_\_

Date & Time form completed:                    /                    /                    hours.

☐ Anonymous (Do not provide identifying information above if anonymous. You must, however, fill out the rest of the form. **Do not check if you are a reporting supervisor.**)

Did the complainant and/or alleged victim notify a supervisor of this complaint prior to now?

☐ Yes (if yes, fill in details)

Who: \_\_\_\_\_

When: Date:        /        /        Time:        hours.

## How

☐ No \_\_\_\_\_

☒ Do not know

☒ Do not know

Section B: Date And Time of Potential Violation

Day, Date and time alleged violation / alleged incident occurred: \_\_\_\_ / \_\_\_\_ / \_\_\_\_ , \_\_\_\_ hours or  
between \_\_\_\_ / \_\_\_\_ / \_\_\_\_ and \_\_\_\_ / \_\_\_\_ / \_\_\_\_

If multiple incidents or unknown, explain:  
See narrative.

---

---

---

Section C: Alleged Complainant(s) (if not the same as the Reporting Party and if they can be identified)

Same as RP Employee # \_\_\_\_\_ Rank/Title \_\_\_\_\_ UOA \_\_\_\_\_

Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_

Employee # \_\_\_\_\_ Rank/Title \_\_\_\_\_ UOA \_\_\_\_\_

Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_

Employee # \_\_\_\_\_ Rank/Title \_\_\_\_\_ UOA \_\_\_\_\_

Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_



Villanueva, Alejandro (Sheriff)	Employee #	246296	UOA	LASD
	Employee #		UOA	
	Employee #		UOA	
	Employee #		UOA	

Pawlowski, Veronica	Employee # 552095	Rank/Title Senior Justice Deputy	UOA BOS
Work Tel# _____	; Home Tel# [REDACTED]	; Work Hours _____ - _____	RDO _____
Coates, Kyla	Employee # 656300	Rank/Title Justice/Health Deputy	UOA BOS
Work Tel# _____	; Home Tel# [REDACTED]	; Work Hours _____ - _____	RDO _____
Huntsman, Max	Employee # 410745	Rank/Title Inspector General	UOA OIG
Work Tel# _____	; Home Tel# [REDACTED]	; Work Hours _____ - _____	RDO _____
_____	Employee # _____	Rank/Title _____	UOA _____
Work Tel# _____	; Home Tel# _____	; Work Hours _____ - _____	RDO _____

(☒ Check, if narrative is continued onto the next page)

Section F (cont'd): Nature of the Complaint or Issue(s) -- Be as detailed as possible, include all incidents & evidence.

(Continued)

have 25-year-old justice deputies who are right out of college and writing all their motions.' This comment was made in front of the public and County staff. This is another example of Sheriff Villanueva discriminating against me based on age."

In addition, Complainant Lim, wrote in pertinent part, "Given Sheriff Villanueva's documented history of intimidation and harassment of women and women of color, as the first, second generation Korean American woman to serve as Justice Deputy and the only Asian Justice Deputy, currently on staff, I believe Sheriff Villanueva is unfairly targeting me, as shown in the July 28, 2021 example.

I am also aware he has targeted, intimidated, and harassed another Asian woman and LA County employee, former Chief Executive Officer, Sachi Hamai."

(ISU Note: A copy of the CPOE complaint is contained in the ISU efile for details.)

\*\*\*\*\*

Note: Continue onto the next page

Section G: Supervisor -- FOR NON-VICTIM SUPERVISORY USE ONLY. DO NOT FILL OUT THIS SECTION IF YOU ARE THE ALLEGED VICTIM OR A NON-SUPERVISOR.

Date & Time notified of potential violation / observation was made: 03 / 16 / 2022 , 1521 hours.

How did you become aware of the potential violation (explain in detail):

On March 16, 2022, the ISU received CPOE ICMS #2022-112209, containing the above allegations.

Supervisor's Actions (if any) (explain in detail)

A POE Report was generated by ISU Deputy Xochilt Rosas to document the allegations in the County Policy of Equity Complaint.

Did you ascertain whether complainant(s) and/or victim(s) are in need of:

☒ Medical Attention

Response: to be ascertained

☒ Protection

Response: to be ascertained

☒ Other Assistance

Response: to be ascertained

Advised the complainant(s) and/or victim(s) that they:

☒ May seek confidential counseling or assistance from Employee Support Services

Notifications:

☐ Intake Specialist Unit phone notification: (During business hours, direct telephone (323) 890-5371. After hours, request through Sheriff's Headquarter's Bureau (323) 526-5541)

Intake Specialist notified via telephone: \_\_\_\_\_ Date & Time: \_\_\_\_ / \_\_\_\_ / \_\_\_\_\_, \_\_\_\_\_ hour.  
(Name)

☒ POE Report/Notification Form forwarded to Intake Specialist Unit

Date & Time: 03 / 16 / 2022 , 1521 hour. How?: ☒ e-mail ☐ Fax ☐ County mail

\*\*\*\*\*

**Section H: For Intake Specialist Unit Use Only** - DO NOT FILL OUT IF YOU ARE REPORTING A POTENTIAL VIOLATION TO THE INTAKE SPECIALIST UNIT.

Intake Specialist Name: Deputy X. Rosas Emp. #: 468743

Day, Date and time ISU received form Thursday / 03 / 17 / 2022 , 1140 hours.

☒ Referred to Equity Unit: Date & Time - 04 / 04 / 2022 , 1700 hours.

☐ If not referred to Equity Unit, explain in detail action taken:

---

---

---

Additional Information (if any): 

---

---

---

---

- ☐ Check here if this violation has already been reported. If so, this form should be attached to the already existing report as an addendum. If the existing report has already been forwarded to the Equity Unit or any other Department entity, this form should be forwarded as well.

CC:

- ☒ Equity Oversight Panel  
☒ Subject's Unit Commander  
☒ Reporting Party's Unit Commander  
☐ Victim's Unit Commander

# EXHIBIT 21

## INTAKE ASSESSMENT FORM

Intake No. 22-046

Date Dept. Notified: 3/17/22

Date ISU Received: 3/17/22

Bouman Yes ☐ No ☒

☐ External

Case No.

Classification: "A"

<b>Alleged Complainant(s):</b> Esther Lim, #662896, Supervisor's Deputy III, Justice Deputy	<b>Involved Party(ies):</b> Alejandro Villanueva, #246296, Sheriff
<b>UOA: Board of Supervisors</b>	<b>UOA: Office of the Sheriff</b>

**Alleged Act(s) Of Harm**

**Alleged Protected Basis(es):**

- |   |  |   |  |
|---|--|---|--|
| <input checked="" type="checkbox"/> Harassment/HWE<br><input type="checkbox"/> Differential Treatment<br><input checked="" type="checkbox"/> Inappropriate Conduct<br><input type="checkbox"/> E-Mail Violation<br><input type="checkbox"/> Failure to Report<br><input checked="" type="checkbox"/> Retaliatory Treatment<br><input type="checkbox"/> Other: | <input checked="" type="checkbox"/> Sex<br><input checked="" type="checkbox"/> Race<br><input type="checkbox"/> Color<br><input checked="" type="checkbox"/> Ancestry<br><input type="checkbox"/> Religion | <input type="checkbox"/> Sexual Orientation<br><input type="checkbox"/> Marital Status<br><input checked="" type="checkbox"/> National Origin<br><input type="checkbox"/> Medical Condition<br><input checked="" type="checkbox"/> Engaging in a Protected Activity | <input checked="" type="checkbox"/> Ethnicity<br><input checked="" type="checkbox"/> Age (40 and Over)<br><input type="checkbox"/> Disability<br><input type="checkbox"/> Association<br><input type="checkbox"/> Other: |
|---|--|---|--|

Based on the information contained in the POE Report/Notification Form and any data indicated on this intake assessment form and/or attachment(s), it has been determined that this complaint:

- ☒ Contains sufficient information to warrant further investigation by EIU  
☐ Contains equity issues, but the allegations do not rise to a level requiring a further investigation by EIU  
☐ No proven equity issues; and/or insufficient information showing causal connection to protected basis  
☐ I/P is a non-department member and/or allegation(s) is/are non-jurisdictional to the POE

**Persons Interviewed**

Date	Name	Emp #	Title	UOA
3/30/22	Esther Lim	662896	Supervisor's Dep. III (Justice Deputy)	BOS
<b><u>Other Persons Referenced in Assessment:</u></b>				
	Xochilt Rosas	468743	B-1 Deputy Sheriff	ISU
	Vickey Bane		Executive Director	CEOP
	John L. Satterfield	410429	Commander/Chief of Staff	Office of the Sheriff
	Janice Hahn		Supervisor	BOS
	Shiela Kuhl		Supervisor	BOS
	Sachi Hamai		CEO - retired	LAC
	Mary Wickham		Executive Director	BRCH
	Max Huntsman	410745	Inspector General	OIG
	Hilda Solis		Supervisor	BOS
	Holly Mitchell		Supervisor	BOS
	Kyla Coates	656300	Justice Health Deputy	BOS
	Veronica Pawlowski	552095	Justice Deputy	BOS
	Kathryn Barger		Supervisor	BOS

Intake #22-046  
Page 2

**Explanation/Comments:**

On March 16, 2022, the Intake Specialist Unit (ISU) received a County Policy of Equity Report (ICMS #2022-112209) addressed to CEOP Executive Director Vicky Bane. Attached was a March 8, 2022, correspondence from Complainant Esther Lim, functional job title, Justice Deputy, employed by the Board of Supervisors.

On March 17, 2022, Xochilt Rosas, Bonus-1 Deputy, ISU, completed a "Policy of Equality Report/Notification Form" (POE Report) on behalf of Reporting Party (R/P) and Complainant Esther Lim, Justice Deputy. Complainant Lim reported that Involved Party Alejandro Villanueva, Sheriff, subjected her to disparaging remarks based on her age (40), sex (female) and race, national origin, ancestry and ethnicity (Asian/Korean).

Complainant Lim made statements during her ISU interview on March 30, 2022, that warranted the addition of a retaliation allegation based on her engagement in protected activity.

Copies of the CPOE report, associated correspondence, and email are contained in the electronic file and hard copy intake folder.

The POE report contained the following information:

(1) Complainant Lim's letter stated, in pertinent part, (verbatim): "On July 28, 2021, Sheriff Villanueva, while in uniform, went on Facebook Live and said, "I don't think the public realizes, when [the Board of Supervisors] write these motions, these are written by their Justice Deputies, who are some 20-something, woke individuals, who are basically putting in words what doesn't pass legal muster at all."

(2) Complainant Lim was told by Kyla Coates, Justice and Mental Health Deputy to Supervisor Janice Hahn, that on February 16, 2022, Sheriff Villanueva said, "All the Supervisors have 25-year-old justice deputies who are right out of college and writing all their motions." This comment was made during a community town hall for the South Bay cities in front of the public and County staff. This was an example of Sheriff Villanueva discriminating based on Complainant Lim's age.

(3) Complainant Lim stated that given Sheriff Villanueva's documented history of intimidation and harassment of women and women of color, as the first second-generation Korean American woman to serve as Justice Deputy and the only Asian Justice Deputy, she believed that Sheriff Villanueva unfairly targeted her.

(4) Complainant Lim alleged that I/P Villanueva targeted, intimidated, and harassed another Asian woman, namely former Chief Executive Officer Sachi Hamai who is now retired from County service.

**ADDITIONAL INCIDENTS/INFORMATION CONTAINED IN COMPLAINANT LIM'S CORRESPONDENCE:**

(1) Besides the CEOP, Complainant Lim sent her letter of complaint to Supervisor Hilda Solis, Ms. Solis' Chief of Staff, the LA County CEO, the County Director of Personnel, the Chief Deputy Counsel, the Inspector General, the Executive Director of the Sheriff Civilian Oversight Commission, and the Chair of the Sheriff Civilian Oversight Commission.

(2) Complainant Lim asked that the CEOP investigate her complaint of retaliation by I/P Sheriff Villanueva and the complaints of others.

(3) Complainant Lim serves as Supervisor Hilda Solis' Justice Deputy.

(4) On October 6, 2021, during a Facebook Live segment, I/P Sheriff Villanueva talked about the Justice Deputies and called them "flunkies". This term maligned and marginalized Complainant Lim's job as a Justice Deputy.

(5) On March 2, 2022, during a Facebook Live segment, in response to an audience question about why there are only women on the Board, I/P Sheriff Villanueva stated, "Good question. They talk about inclusivity. No male justice deputy staff. The Board should explain why they exclude men from their ranks." He further

Intake #22-046  
Page 3

stated that the people they hire are all twenty-something fresh out of college; "woke flunkies" straight out of college; in their "first job". He stated they write the "nonsense" Board orders.

(6) Complainant Lim stated that I/P Villanueva's disparaging and discriminatory comments that discredit her character, education and experience are linked to her age, sex and race.

(7) I/P Villanueva's July 27, 2021, comments were in retaliation to the motion: "Taking Action: Further Protections For Serving Families from Law Enforcement Harassment and Retaliation".

(8) I/P Villanueva's February 16, 2022, comments were made in front of the public, County staff deputies and field staff. The comments were relayed to Kyla Coates, Justice and Mental Health Deputy to Supervisor Janice Hahn, who shared the comments with Complainant Lim and Veronica Pawlowski, Justice Deputy to Supervisor Sheila Kuehl.

(9) Complainant Lim asserted that I/P Villanueva's statements, made by the Sheriff of the largest Sheriff's Department in the country with an extraordinary amount of power, influence and resources, are not just inaccurate but inflammatory and dangerous. Complainant Lim had concerns for her safety and the safety of other victims of I/P Sheriff Villanueva's actions. Complainant Lim noted that the Sheriff was in uniform during the Facebook Live sessions.

#### MISCELLANEOUS:

A review of the Board of Supervisors' website revealed that staff under all Supervisors were comprised of:

District 1 Solis: Approximately 9 males and 20 females  
District 2 Mitchell: Approximately 9 males and 28 females  
District 3 Kuehl: Approximately 8 males and 30 females  
District 4 Hahn: Approximately 6 males and 13 females  
District 5 Barger: Approximately 9 males and 13 females

#### ISU INTERVIEW WITH COMPLAINANT JUSTICE DEPUTY ESTHER LIM:

On March 30, 2022, Senior Deputy Compliance Officer Linda Vaia interviewed Complainant Lim telephonically. Before the specific interview questions and immediately thereafter, SDCO Vaia explained the general ISU assessment process.

During the recorded interview, Complainant Lim stated:

(1) Complainant Lim is a Supervisor's Deputy III, with the functional job title of Justice Deputy. She was appointed by the Board of Supervisors and is an 'at-will employee'. Complainant Lim has been in the position for two years. She self-identified as age 40 years, female and Asian/Korean.

(2) There are five Justice Deputies; one for each Supervisor. Complainant Lim stated that she is the only Asian Justice Deputy. There are four female Justice Deputies. Supervisor Holly Mitchell has one male Justice Deputy. The Board is comprised of five (5) females.

[ISU NOTE: Supervisor Mitchell's male Justice Deputy has the functional title Senior Deputy, Justice. There is another male with the functional job title Deputy, Justice and Arts & Culture.]

(3) There are other Supervisors' Deputies, and the functional title is dependant on the issue area.

(4) Complainant Lim's area is Public Safety and Justice. Public Safety is comprised of Probation, LASD, District Attorney, Public Defender and the various law enforcement-related commissions that the Board oversees. Complainant Lim described it as a "hefty" law enforcement oversight work portfolio.

(5) Prior to County employment, Complainant Lim worked for the ACLU of Southern California and interacted with prior LASD Sheriffs. She did not have similar (negative) contacts with the prior Sheriffs. She met Sheriff



Intake #22-046  
Page 4

Villanueva when he was a candidate.

(6) Complainant Lim's contacts with Sheriff Villanueva have been all work-related. They do not engage in social banter. I/P Villanueva has not made direct or overt statements to her regarding age, gender or racial issues. Sheriff Villanueva would be familiar with Complainant Lim both in her role as Supervisor Solis' Justice Deputy and from her prior role with the ACLU.

[ISU NOTE: Related to POE issues in general, on February 9, 2021, I/P Sheriff Villanueva wrote a letter to Supervisor Solis that asserted Complainant Lim's "twitter" social media account contained examples of racial, gender, age bias and other non-POE related characteristics and examples. The letter is available on the LASD intranet and the internet.]

(7) During the July 28, 2021, Facebook Live segment, Complainant Sheriff Villanueva held and read from a motion Complainant Lim had worked on ("Taking Action: Further Protections for Surviving Families from Law Enforcement Harassment and Retaliation). Complainant Lim's initials were on the document. He made negative comments.

[ISU NOTE: As previously described, the comments were: "I don't think the public realizes, when [the Board of Supervisors] write these motions, these are written by their Justice Deputies, who are some 20-something, 'woke' individuals, who are basically putting in words what doesn't pass legal muster at all."

(8) I/P Sheriff Villanueva's Facebook Live comments trivialized and minimized Complainant Lim. She noted that in other instances I/P Villanueva referred to Justice Deputies as "recent" college grads. Complainant Lim has 20 years experience in her field. Therefore, the comments were linked to her age (40) as a 20-something cannot have her years of experience and knowledge.

(9) Complainant Lim noted that Sheriff Villanueva's statements were not private statements but made on a large media platform to a wide audience. [ISU NOTE: As previously noted, I/P Sheriff Villanueva was in his LASD uniform.]

(10) I/P Villanueva used "woke" in a pejorative manner. I/P Sheriff Villanueva used the term to mean radically progressive or an activist and equated the term to "snowflake". "Woke" can be used in a general way to mean reform, but the manner and context used by I/P Sheriff Villanueva was negative.

[ISU NOTE: Merriam Webster online dictionary defined "woke" as: aware of and actively attentive to important facts and issues (especially issues of racial and social justice). One of the definitions of "snowflake" was someone overly sensitive. The Urban online crowd sourced Dictionary of slang, defined "woke" as an evolving word that is almost always used non-ironically/seriously only by political Progressives. Conservatives or Libertarians use it mostly to poke fun at the others' usage of it. The Urban Dictionary defined snowflake as a very sensitive person, someone who is easily hurt or offended by the statements or actions of others.]

(11) Complainant Lim stated that I/P Sheriff Villanueva's use of the term "flunkies" was about all the Justice Deputies, and it is not a term of endearment. She stated that I/P Villanueva's overall comments were demeaning and negative towards women.

[ISU NOTE: Merriam Webster online dictionary defined "flunky" as a liveried servant; one performing menial or miscellaneous duties; and a yes-man.]

(12) Complainant Lim stated that I/P Villanueva has a history of misogynistic comments about women and women of color. She named two additional potential witnesses besides the witnesses named in her CEOP complaint: Veronica Pawloski, Justice Deputy for Supervisor Shiela Kuehl; Kyla Coates, Justice and Health Deputy for Supervisor Janice Hahn, and Max Huntsman, Inspector General, Office of the Inspector General.

[ISU NOTE: Max Huntsman is a complainant in POE/Intake #22-045. I/P Sheriff Villanueva is the Involved Party. The matter is pending an ISU assessment.]

(13) The additional witnesses who were also subjected to I/P Villanueva's ill treatment were Sachi Hamai,

Intake #22-046  
Page 5

Asian, female; and Mary Wickham, female. The issues between Sachi Hamai and I/P Sheriff Villanueva were very public and well documented in the press. Ms. Hamai received a financial settlement.

[ISU NOTES: a) Sachi Hamai was the first Asian American woman to serve as Los Angeles County Chief Executive Officer between December 2014 and her retirement on August 31, 2020. The CEO provides Countywide coordination and strategic guidance. Ms. Hamai's retirement and \$1.5 million settlement and full-time private security was reported widely in the press. The legal settlement was responsive to Ms. Hamai's claims regarding severe and pervasive harassment, defamation, malicious prosecution and hostility by I/P Villanueva.

b) Ms. Hamai, according to various news sources, stated, "It is so disheartening that I have been subjected to a hostile and toxic work environment created by a fellow department head". She stated, "As I leave Court Service, it is my sincere hope that no other County employee, male or female, in any part of our great organization, should face hostility of this kind, let alone from a department head in a position of power and public trust."

c) Mary Wickham was appointed to serve as Los Angeles County Counsel between 2015 and September 2020. She was elected by the judges of the court along with directors of relevant nonprofits, to serve as LA Superior Court Commissioner in November 2020. She retired in July 2021. On August 31, 2021, Ms. Wickham was rehired and appointed to head the Blue-Ribbon Commission on Homelessness established by the Board of Supervisors.

d) Based on their respective years of County service, both Ms. Hamai and Ms. Wickham are over 40 years old.]

(14) Complainant Lim stated that I/P Villanueva treats Supervisor Kathryn Barger more favorably (than the other Supervisors) because he perceived her to be friendly to law enforcement.

(15) Complainant Lim alleged that during a Supervisors meeting last year, I/P Villanueva stated that the Supervisors should be taken to the shed and beat. He has made similar statements many times.

(16) I/P Sheriff Villanueva sent a complaint letter about Complainant Lim to Supervisor Solis. Complainant Lim stated that the OIG's response was to ask I/P Sheriff Villanueva what the purpose was of his going on Complainant Lim's personal twitter account. I/P Sheriff Villanueva also filed a CPOE complaint against Complainant Lim, but she does not know the details.

[ISU NOTE: Complainant Lim's complaint letter to the CEOP contained a footnote about I/P Sheriff Villanueva's complaint against her. A March 8, 2021, CEOP letter advised Complainant Lim that the allegations (against her) did not present a potential violation of the CPOE. Anecdotally, staff at the CEOP advised SDCO Vaisa that complainants are notified through a standardized email that their complaint was addressed.]

(17) Complainant Lim stated that I/P Sheriff Villanueva has made many other inappropriate comments and provided only the four examples in her letter.

(18) In a March 17, 2022, Facebook Live segment, I/P Sheriff Villanueva made a comment about Complainant Lim's letter of complaint only a week after submission of her letter of complaint.

[ISU NOTE: a) In a March 16, 2022, Facebook Live segment, I/P Sheriff Villanueva referenced Complainant Lim. At the 41 minute 40 second mark, I/P Sheriff Villanueva discussed his February 9, 2021, letter of complaint about Complainant Lim sent to Supervisor Solis. He stated that he was not advised of the outcome and Complainant Lim remains on Supervisor Solis' staff. I/P Sheriff Villanueva stated that on March 4, 2022, he sent Supervisor Solis a follow-up letter regarding Ms. Lim's ethical violations. He advised Supervisor Solis to pick up the pace to look into the matter. b) ISU was unable to locate a March 16, 2022, Facebook Live segment.]

(19) Complainant Lim asserted that the Sheriff's comments were intended to have a chilling effect and stop him from being held accountable. She stated I/P Sheriff Villanueva's comments are dangerous on all levels

Intake #22-046  
Page 6

and damaging to careers. He is coming after people who have oversight responsibilities. She added I/P Sheriff Villanueva's comments can trigger those who support the Sheriff, to act against her; such as to find out where she lives.

**Admonishment/Supervisory Actions:**

On March 23, 2022, Commander John L. Satterfield admonished I/P Sheriff Villanueva.

**Prior Related POE Complaint(s):**

☐ None ☒ Prior Related POE Complaint(s) Identified Below

The equity database revealed that Sheriff Villanueva was an Involved Party in five other POE cases.

- (1) As previously described, POE #22-045 is pending an ISU assessment. The allegations in that matter relate to race, ethnicity, national origin, ancestry and religion.
- (2) In Intake #21-108, an anonymous Complainant alleged that I/P Villanueva engaged in conduct linked to (race, national origin and ethnicity). Intake #21-108 received a "B" classification.
- (3) In Intake #12-019, a named CP alleged I/P (then) Lt. Villanueva made a 'racial slur' toward another named CP. Intake #12-019 received an "A" classification.
- (4) In Intake #04-221, a named CP alleged a named I/P used an inappropriate term "Bitches and Whores" and I/P (then) Sgt. Villanueva and two others, named I/Ps, failed to report the alleged conduct. Intake #04-221 received an "A" classification.
- (5) In Intake #04-177, a named Complainant (female volunteer) alleged a named I/P (male volunteer) called her a "bitch" and I/P (then) Sgt. Villanueva and another named I/P failed to report the alleged conduct. Intake #04-177, received an "A" classification.

**Conclusion:**

MPP 3-01/121.05 (POE - Prohibited Conduct)

MPP 3-01/121.10 (POE - Discrimination)

MPP 3-01/121.15 (POE - Sexual Harassment)

MPP 3-01/121.20 (POE - Harassment (Other Than Sexual))

MPP 3-01/121.25 (POE - Third-Person Harassment)

MPP 3-01/121.30 (POE - Inappropriate Conduct Toward Others)

MPP 3-01/121.35 (POE -Retaliation)

**OTHER SOURCE MATERIAL:**

(1) Relevant to harassment, the California Department of Fair Employment and Housing Case Analysis Manual stated:

- a) Acts qualify as harassment if the focus and/or content of the harassing acts is the complainant's protected status and the acts created an intimidating, oppressive, hostile or offensive working environment;
- b) The link between adverse acts and an asserted protected basis may be of a disputed nature; such as when the adverse acts are on the face neutral or do not tell directly the enumerated basis and may be established

Intake #22-046  
Page 7

via other analytical factors such as anecdotally, inference and the comparative treatment of others. Other specific areas to consider included a pattern of similar incidents.

c) Conflicting pieces of evidence and the number of pieces of evidence do not cancel one another out. The overall stronger evidence prevails after close evaluation. An enumerated basis need only be one of the factors in the adverse act and not the sole factor.

(2) The EEOC Enforcement Guidance on National Origin Discrimination stated that Title VII also prohibits "intersectional" discrimination, which occurs when someone is discriminated against because of the combination of two or more protected bases (e.g., national origin and race). EEOC specifically noted that "Some characteristics, such as race, color, and national origin, often fuse inextricably. Title VII prohibits employment discrimination based on any of the named characteristics, whether individually or in combination. Because intersectional discrimination targets a specific subgroup of individuals, Title VII prohibits, for example, discrimination against Asian women even if the employer has not also discriminated against Asian men or non-Asian women."

**Summary:**

Complainant Lim is a 40-year-old Asian/Korean female. There is no dispute that she engaged in protected activity by virtue of her complaint to the CEOP [Reference a, b, c and d below].

(1) At least two of the alleged incidents strongly and logically infer age. Specifically:

a) On July 28, 2021, I/P Sheriff Villanueva, said on Facebook Live, "I don't think the public realizes, when [the Board of Supervisors] write these motions, these are written by their Justice Deputies, who are some twenty-something, woke individuals, who are basically putting in words what doesn't pass legal muster at all." He held up a motion Complainant Lim worked on, and which contained her initials.

b) On February 16, 2022, during a community town hall, Sheriff Villanueva said, "All the Supervisors have 25-year-old justice deputies who are right out of college and writing all their motions."

**\*\*Complainant Lim is 40 years old with 20 years experience in her field. Complainant Lim's assertion, that statements equating her years of experience to a new college graduate trivialized and minimized her experience, appears to be a reasonable conclusion. Ignoring and degenerating twenty years of experience and knowledge is, therefore, logically linked to age in the specific context described.**

(2) The other two examples/incidents infer gender. Specifically:

c) On March 2, 2022, during a Facebook Live segment, in response to an audience question about why there are only women on the Board, I/P Villanueva segued to the Board's staffing. He stated there were no male justice deputy staff, and the Board should explain why men are excluded from their ranks. He stated that the people they hire are all twenty-something fresh out of college, "woke flunkies", in their "first job." He also stated they write the "nonsense" Board orders.

[ISU NOTE: It is unclear why an audience member asked I/P Sheriff Villanueva about an all-female Board, as the Board is elected by the public. I/P Sheriff Villanueva has no control over who the public votes into office.]

d) On October 6, 2021, during a Facebook Live segment, I/P Sheriff Villanueva talked about the Justice Deputies and called them "flunkies".

**\*\*I/P Villanueva inaccurately described the Board of Supervisors' Justice Deputies and the Board staff, as all female when there are male Justice Deputies and approximately 41 males on staff. Therefore, the pejorative labels and terms I/P Sheriff Villanueva used in the above-described incidents, appear directed to women exclusively. Complainant Lim named four females as witnesses, all of a very high professional rank, including former CEO Sachi Hamai and former County Counsel Mary Wickham.**

Intake #22-046  
Page 8

(3) The overall data infers race, national origin, ancestry and ethnicity. Specifically:

It is clear that I/P Sheriff Villanueva's comments were offensive, professionally, to all who shared Complainant Lim's rank/classification of Justice Deputy. Complainant Lim noted that she is the only Asian/Korean Justice Deputy. Mere membership is not sufficient to establish a link between an adverse harm and an asserted enumerated basis. It is also noted that the "Justice Deputy" is a very small employee pool.

However, factors to consider are: a) whether there is a pattern of similar incidents and comparative treatment of others; b) an enumerated basis need not be the sole factor in an adverse act; c) the same adverse acts can be linked to multiple enumerated bases as well as non-enumerated bases; and d) intersectional discrimination, such as Asian female.

\*\*Complainant Lim named Sachi Hamai, as a witness. Ms. Hamai was the first Asian American woman to serve as Los Angeles County Chief Executive Office. Ms. Hamai asserted that I/P Sheriff Villanueva subjected her to a hostile and toxic work environment, severe and pervasive harassment, defamation, and malicious prosecution. It is perhaps anecdotal but critical to note that Complainant Lim's motion was the only motion I/P Sheriff Villanueva physically had in his hand and used on Facebook Live, a social media platform with a large audience.

(4) The overall data inferred that retaliation potentially may be a factor. Specifically:

As stated previously, Complainant Lim engaged in protected activity by virtue of her March 8, 2022, letter to the CEOP Executive Director and the filing of the CEOP report form. The letter was also sent to various other non-LASD staff. It is of note that the letter and CEOP report are dated March 8, 2022, and LASD was notified March 16, 2022. I/P Villanueva was admonished March 23, 2022. It is unknown whether he was advised of the Complainant's name. ISU is unaware whether anyone else was notified between March 8, 2022, and March 16, 2022, or if anyone communicated with I/P Sheriff Villanueva in that interval.

\*\*Complainant Lim's concerns that I/P Sheriff Villanueva's comments were dangerous on all levels and damaging to careers appeared credible, plausible and mirrored another female's concerns in a legal settlement where the female was awarded private security.

I/P Sheriff Villanueva's disparaging comments were made on LASD communication system and equipment while he was in uniform. The statements used unprofessional slang and portions were factually inaccurate, i.e., there are males on the Board of Supervisors' staff and the motion in question was not written by a twenty-something recent college graduate. The statements were made on a large media platform to a wide audience and thus appear to be a potential employment harm.

A strong inference of retaliation can be drawn when an adverse action occurs shortly after the protected activity.

As stated, Complainant Lim submitted her POE complaint on March 8, 2022. The review of a March 16, 2022, Facebook Live segment revealed that I/P Sheriff Villanueva referenced Complainant Lim and his February 9, 2021, complaint about her. It is, at a minimum, odd timing that I/P Sheriff Villanueva discussed an over-a-year-old complaint shortly after Complainant Lim's POE complaint about I/P Sheriff Villanueva was filed.

Given that: a) the alleged conduct involved a high ranking member of the Department (the Sheriff) and prior high level County employees, as well as staff at the Board of Supervisors and the OIG office; b) the unprofessional and documented language was disseminated to a wide audience via LASD social media and, therefore, the Department's communication system; and c) the subjective nature of the asserted harassing comments that overlap with non-POE memberships (education, politics); the alleged documented conduct warrants further investigation by the IAB's Equity Investigations Unit that includes interviews of the Involved Party, the named witnesses and others determined by IAB. Accordingly, an "A" classification is recommended for Intake #22-046.

Intake #22-046  
Page 9

[ISU NOTE: Although federal and state laws and court decisions were referenced, the findings in this Confidential Intake Assessment Form do not reach questions of law as to whether the adverse treatment support a violation of applicable federal (or state) laws, but instead this Confidential Intake Assessment Form addresses whether the alleged conduct, under the Sheriff's Policy of Equality (POE), is equity-related and/or rises to the level of a further investigation by the Sheriff's Equity Investigations Unit.

**RECOMMENDATION(S) for UOA, including, but not limited to the following:**

- ☐ Informal conflict resolution with all parties involved, by appropriate supervisor
- ☐ DHR assisted mediation \_\_\_\_\_
- ☐ Referral to Equity Compliance Unit/ADA \_\_\_\_\_
- ☐ Referral to Equity Compliance Unit/AA \_\_\_\_\_
- ☐ Supervisory inquiry/unit level investigation for Non-Equity based allegations of misconduct, if appropriate
- ☐ Counseling with PLE regarding the conduct in question, if appropriate
- ☐ Re-briefing applicable provisions of the Policy Of Equality (POE):
  - ☐ POE Sexual Harassment
  - ☐ POE Discriminatory Harassment
  - ☐ POE Inappropriate Conduct
  - ☐ POE Third Person Harassment
  - ☐ Other: \_\_\_\_\_
  - ☐ POE Retaliation
  - ☐ POE Duties of Supervisors
  - ☐ POE Examples of Conduct
  - ☐ POE Discrimination
- ☐ Re-briefing applicable provisions of the Manual of Policy & Procedures (MPP):
  - ☐ Manner of Giving Orders & Instructions
  - ☐ Relationship with Subordinates
  - ☐ Permissible Use
  - ☐ General Behavior
  - ☐ Other: \_\_\_\_\_
  - ☐ Conduct Toward Others
  - ☐ Derogatory Language
  - ☐ System Use
  - ☐ Professional Conduct
- ☐ Re-briefing applicable "Lessons Learned" Bulletins:
  - ☐ Supervisor Responsibility-Duty to Report
  - ☐ Being Offended Is Not An Element
  - ☐ E-mail - Supervisor Responsibility
  - ☐ Religious Accommodation and Etiquette
  - ☐ Sexual Gossip in the Workplace
  - ☐ Lactation Accommodation
  - ☐ Other: \_\_\_\_\_
  - ☐ ADA Title I Employment Rights
  - ☐ E-mail - Common Electronic Workplace Violations
  - ☐ Languages in the Workplace
  - ☐ Prevention is Still the Best Cure - Supervisor
  - ☐ Hostile Work Environment under the POE
  - ☐ Professional Conduct - Persons With Disabilities
- ☐ Training/Briefing:
  - ☐ Disability Awareness/Etiquette
  - ☐ Team Building Skills
  - ☐ Respect Based Leadership
  - ☐ Diversity/Inclusion/Cultural Awareness
  - ☐ Effective Communication
  - ☐ Interactive Process/Reasonable Accommodation
  - ☐ Medical Management/Health Care
  - ☐ Sexual Harassment Prevention
  - ☐ Relationship Management
  - ☐ Other: \_\_\_\_\_
- ☐ Re-briefing RMB's "Risky Business" newsletters and FOSS newsletter:
  - ☐ RMB - Use of Derogatory Terms or Phrases (Vol. 12, No. 03)
  - ☐ FOSS - Inappropriate Terms & Phrases-Related Lawsuit (Vol. 14, No. 15)
  - ☐ RMB - Inappropriate Behavior (Vol. 15, No. 04)
  - ☐ Other: \_\_\_\_\_
- ☐ Submit Copy of APIS Roster for Attendees of Re-Briefing and/or Training
- ☐ As may be appropriate, it is recommended that the Unit Commander or his/her designee inform the Involved Party and Complainant that the complaint was addressed.
- ☐ Other Recommendation(s): \_\_\_\_\_  
\_\_\_\_\_



Intake #22-046

Page 10

Assessed by ISU Deputy Compliance Officer:

Senior DCO Linda Vaisa	Date Assessed: 4/4/22	Date Received: 3/17/22
------------------------	-----------------------	------------------------

Reviewed by ISU Lieutenant or Sergeant:

Sgt Steven M. Johnson	Date: 4/06/22
-----------------------	---------------

Forwarded to EIU by:

B-1 Deputy Jonathan Lested	Date: 4/04/22
----------------------------	---------------

Reviewed by CEOP:

	Date:
--	-------

CEOP Comments:

--

CONFIDENTIAL

# EXHIBIT 22



COUNTY OF LOS ANGELES  
**SHERIFF'S DEPARTMENT**  
"A Tradition of Service Since 1850"

DATE: June 27, 2022  
IV NO: 2558101

OFFICE CORRESPONDENCE

FROM:

EDWIN A. ALVAREZ, CHIEF  
PROFESSIONAL STANDARDS DIVISION

TO:

RON KOPPERUD, CAPTAIN  
INTERNAL AFFAIRS BUREAU

**SUBJECT: SUBJECT OF ADMINISTRATIVE INVESTIGATION NOTIFICATION**

SUBJECT EMPLOYEE NAME, RANK, AND EMPLOYEE NUMBER.

Alex Villanueva, Sheriff, #246296

Department Knowledge Date (The date a sergeant, or above, became aware of an act, omission, or other misconduct):

03/17/2022

Potential MPP Violation(s) including, but not limited to:

3-01/030.10 POE - DISCRIMINATION  
3-01/121.15 POE - SEXUAL HARASSMENT  
3-01/121.20 POE - DISCRIMINATORY HARASSMENT (OTHER THAN SEXUAL)  
3-01/121.25 POE - THIRD PERSON HARASSMENT  
3-01/121.30 POE - INAPPROPRIATE CONDUCT TOWARD OTHERS  
3-01/121.35 POE - RETALIATION

Nature of the investigation (general description):

It is alleged you acted in an inappropriate POE related manner and made inappropriate POE related remarks while in the workplace.

You are advised that the authorization given by your Unit Commander to other supervisors to approve your routine absence requests has been rescinded. You are being ordered by your Unit Commander that during the time this investigation is active, any routine absence request must be submitted directly to him/her, and approval or denial of the request must come directly from them as well. You are additionally reminded of your responsibilities in submitting absence requests under **MPP 3-02/030.05 - ROUTINE ABSENCES**.

**SUBJECT EMPLOYEE ACKNOWLEDGEMENT OF NOTIFICATION:**

Subject: [Signature]

Witness: [Signature]

Employee #: 246296

Date: 6/29/22

Employee #: 410429

Date: 6/29/22



CONFIDENTIAL

COLA002192

EXHIBIT 22 - Page 439

Manual of Policy and Procedures : 3-01/121.10 - Policy of Equality - Discrimination

---

### **3-01/121.10 - Policy of Equality - Discrimination**

Discrimination is the disparate or adverse treatment of an individual based on or because of that individual's:

- Age (40 and over);
- Ancestry;
- Color;
- Denial of family and medical care leave;
- Disability (physical and mental, including HIV and AIDS);
- Ethnicity;
- Gender identity/gender expression;
- Genetic information;
- Marital status;
- Medical condition (genetic characteristics, cancer, or a record or history of cancer);
- Military or veteran status;
- National origin (including language use restrictions);
- Race;
- Religion (includes religious dress and grooming practices);
- Sex/gender (includes pregnancy, childbirth, breastfeeding, and/or related medical conditions);
- Sexual orientation; and
- Any other characteristic protected by state or federal law.

**Revised: 11/20/2020**

---

Manual of Policy and Procedures : 3-01/121.15 - Policy of Equality - Sexual Harassment

---

### **3-01/121.15 - Policy of Equality - Sexual Harassment**

Sexual harassment includes unwelcome sexual advances, requests for sexual favors, and other verbal, visual, or physical conduct of a sexual nature which meets any one of the following criteria:

- Submission to such conduct is made either explicitly or implicitly as term or condition of an individual's employment;
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- Such conduct has the purpose or effect of unreasonably interfering with the individual's employment or creating an intimidating, hostile, offensive, or abusive working environment, and a reasonable person subjected to the conduct would find that the harassment so altered working conditions as to make it more difficult to do the job.

**Revised: 11/20/2020**

---

---

Manual of Policy and Procedures : 3-01/121.20 - Policy of Equality - Harassment (Other Than Sexual)

---

### **3-01/121.20 - Policy of Equality - Harassment (Other Than Sexual)**

Harassment of an individual based on or because of the individual's protected characteristic is also discrimination and prohibited. Harassment is conduct which has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, offensive, or abusive work environment, and a reasonable person subjected to the conduct would find that the harassment so altered working conditions as to make it more difficult to do the job.

**Revised: 11/20/2020**

Manual of Policy and Procedures : 3-01/121.25 - Policy of Equality - Third-Person  
Harassment

---

### **3-01/121.25 - Policy of Equality - Third-Person Harassment**

Third person harassment is indirect harassment of a bystander, even if the person engaging in the conduct is unaware of the presence of the bystander. When an individual engages in potentially harassing behavior, they assumes the risk that someone may pass by or otherwise witness the behavior. The Department considers this to be the same as directing the harassment toward that individual.

**Revised: 11/20/2020**

Manual of Policy and Procedures : 3-01/121.30 - Policy of Equality - Inappropriate  
Conduct Toward Others

---

### **3-01/121.30 - Policy of Equality - Inappropriate Conduct Toward Others**

Inappropriate conduct toward others is any physical, verbal, or visual conduct based on or because of any of the protected characteristics described in this policy, when such conduct reasonably would be considered inappropriate for the workplace.

This provision is intended to stop inappropriate conduct based on a protected characteristic before it becomes discrimination, sexual harassment, retaliation, or harassment under this policy. As such, the conduct need not meet legally actionable state and/or federal standards to violate this policy. An isolated derogatory comment, joke, racial slur, sexual innuendo, etc., may constitute conduct that violates this policy and be grounds for discipline. Similarly, the conduct need not be unwelcome to the party against whom it is directed; if the conduct reasonably would be considered inappropriate by the Department for the workplace, it will violate this policy.

**Revised: 11/20/2020**

Manual of Policy and Procedures : 3-01/121.35 - Policy of Equality - Retaliation

---

### **3-01/121.35 - Policy of Equality - Retaliation**

Retaliation, for the purposes of this policy, is an adverse employment action against another for reporting protected incident, filing a complaint of conduct or opposing conduct that violates this policy or related state or federal law, participating in an investigation, administrative proceeding, or otherwise exercising their rights or performing their duties under this policy or related state or federal law.

**Revised: 11/20/2020**

# EXHIBIT 23





# OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ROBERT G. LUNA, SHERIFF



January 4, 2022

Mr. Alejandro Villanueva  
2183 El Cajonita Drive,  
La Habra, California 90631

Dear Mr. Villanueva:

## ADMINISTRATIVE INVESTIGATION INTERVIEW REQUEST

The Los Angeles County Sheriff's Department is conducting an administrative investigation into a matter in which you are a subject.

The incident occurred at/on March 17, 2022. It is our Department's policy to conduct complete and thorough investigations into complaints or allegations of violations of Department policy on the part of our employees; therefore, it is important that you be interviewed.

Please contact Ms. Christine Diaz-Herrera, attorney at law from Sanders Roberts LLP, at (213) 426-5000 extension 6889 or via email at [cdiazherrera@sandersroberts.com](mailto:cdiazherrera@sandersroberts.com), to schedule an interview in person or via telephone. Your cooperation in this matter is appreciated.

If you have any questions, you may also contact Lieutenant John L. Carter at (323) 890-5304.

Sincerely,

ROBERT G. LUNA, SHERIFF

  
Ron Kopperud, Captain  
Internal Affairs Bureau

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1850 —

AV009865

# EXHIBIT 24

**From:** Alex Villanueva  
**Sent:** Friday, March 10, 2023 6:54 PM PST  
**To:** Christine Diaz-Herrera  
**Subject:** Re: [External] Re: Administrative Investigation Interview Request

You don't have a "standard practice" regarding making a subject out of someone you have no jurisdiction over and engaging in something the department has never done before. I'd love to help you, however your terms are unethical and unacceptable. I simply asked you what the issue was about, I don't need to know the specific questions you're going to ask. Example: Captain so and so alleges that he was denied x position because he did xyz.

Regards

On Mon, Mar 6, 2023 at 3:34 PM Christine Diaz-Herrera <[cdiazherrera@sandersroberts.com](mailto:cdiazherrera@sandersroberts.com)> wrote:

Mr. Villanueva,

Given your previous role, I assume that you are well aware that the subject of an investigation does not know the questions he or she will be asked before an interview. This is standard practice. Likewise, it is standard practice to give the subject of an investigation the chance to respond to allegations during an interview. You previously stated that you would cooperate with the investigation. I can make myself available based on your schedule. Please let me know if you are still willing to make yourself available to be interviewed.

Lastly, I would like to remind you that if you become represented by counsel, please let me know so I can contact them directly.

Best regards,

Christine



**Christine Diaz-Herrera**, ATTORNEY AT LAW

[cdiazherrera@sandersroberts.com](mailto:cdiazherrera@sandersroberts.com)

Sanders Roberts LLP

1055 West 7th Street, Suite 3200 | Los Angeles, CA 90017

p 213 426 5000 x6889 | f 213 234 4581 | [sandersroberts.com](https://www.sandersroberts.com)

NOTICE: CONFIDENTIAL AND PRIVILEGED INFORMATION - This email may contain confidential and privileged material for the sole use of the intended recipient(s). Any review, distribution or disclosure by others is strictly prohibited. If you are not the intended recipient (or authorized to receive for the recipient), please contact the sender by reply email and delete all copies of this message. Any tax advice contained in this email was not intended to be used, and cannot be used, by you (or any other taxpayer) to avoid penalties under the Internal Revenue Code of 1986, as amended.

---

**From:** Alex Villanueva <[sheriffvillanueva33@gmail.com](mailto:sheriffvillanueva33@gmail.com)>  
**Sent:** Monday, March 6, 2023 3:06 PM  
**To:** Christine Diaz-Herrera <[cdiazherrera@sandersroberts.com](mailto:cdiazherrera@sandersroberts.com)>  
**Subject:** Re: [External] Re: Administrative Investigation Interview Request

Your response only confirms my suspicions. For the record there were several incidents that occurred during the McDonnell administration that merited questioning him, but it would have been wildly inappropriate to make him a subject of an administrative investigation - and we never did.

Your actions are unethical and without legal authority or precedent.

Thank you

On Mon, Mar 6, 2023 at 2:51 PM Christine Diaz-Herrera <[cdiazherrera@sandersroberts.com](mailto:cdiazherrera@sandersroberts.com)> wrote:

Thank you for your response. I am unable to provide my questions in advance. As I stated below, it is alleged that you acted in an inappropriate POE related manner and made inappropriate POE related remarks in the workplace. The specific allegations include, but are not limited to, potential Manual of Policy and Procedures ("MPP") violations of the following:

3-01/121.10 POE – Discrimination

3-01/121.15 POE – Sexual Harassment (Other Than Sexual)

3-01/121.20 POE – Discriminatory Harassment (Other Than Sexual)

3-01/121.25 POE – Third Person Harassment

3-01/121.30 POE – Inappropriate Conduct Toward Others

3-01/121.35 POE – Retaliation

I will provide more information during the interview itself. Please let me know when you are available.

Best,

Christine



**Christine Diaz-Herrera**, ATTORNEY AT LAW

[cdiazherrera@sandersroberts.com](mailto:cdiazherrera@sandersroberts.com)

**Sanders Roberts LLP**

1055 West 7th Street, Suite 3200 | Los Angeles, CA 90017

p 213 426 5000 x6889 | f 213 234 4581 | [sandersroberts.com](https://sandersroberts.com)

NOTICE: CONFIDENTIAL AND PRIVILEGED INFORMATION - This email may contain confidential and privileged material for the sole use of the intended recipient(s). Any review, distribution or disclosure by others is strictly prohibited. If you are not the intended recipient (or authorized to receive for the recipient), please contact the sender by reply email and delete all copies of this message. Any tax advice contained in this email was not intended to be used, and cannot be used, by you (or any other taxpayer) to avoid penalties under the Internal Revenue Code of 1986, as amended.

---

**From:** Alex Villanueva <[sheriffvillanueva33@gmail.com](mailto:sheriffvillanueva33@gmail.com)>

**Sent:** Thursday, February 9, 2023 4:47 PM

**To:** Christine Diaz-Herrera <[cdiazherrera@sandersroberts.com](mailto:cdiazherrera@sandersroberts.com)>

**Subject:** Re: [External] Re: Administrative Investigation Interview Request

I'm not concerned about what your practices may be, particularly given the challenging optics of making a former sheriff the subject of an administrative investigation. This is troubling on so many levels, and while I am more than happy to cooperate with you, it will be on my terms. Please advise how you wish to proceed.

Alex

On Thu, Feb 9, 2023 at 1:50 PM Christine Diaz-Herrera <[cdiazherrera@sandersroberts.com](mailto:cdiazherrera@sandersroberts.com)> wrote:

Good afternoon Mr. Villanueva,

Thank you for your response and confirmation that you are not currently represented by counsel. In the event that you become represented by counsel, please let me know and I will communicate directly with your attorney.

It is alleged that you acted in an inappropriate POE related manner and made inappropriate POE related remarks in the workplace. The specific allegations include, but are not limited to, potential Manual of Policy and Procedures ("MPP") violations of the following:

3-01/121.10 POE – Discrimination

3-01/121.15 POE – Sexual Harassment (Other Than Sexual)

3-01/121.20 POE – Discriminatory Harassment (Other Than Sexual)

3-01/121.25 POE – Third Person Harassment

3-01/121.30 POE – Inappropriate Conduct Toward Others

3-01/121.35 POE – Retaliation

It is not our practice to submit questions in advance of the interview. Should you have any further questions, I can be reached at 626-372-4848. Thank you.

Best,

Christine





**Christine Diaz-Herrera**, ATTORNEY AT LAW

[cdiazherrera@sandersroberts.com](mailto:cdiazherrera@sandersroberts.com)

**Sanders Roberts LLP**

1055 West 7th Street, Suite 3200 | Los Angeles, CA 90017

p 213 426 5000 x6889 | f 213 234 4581 | [sandersroberts.com](https://sandersroberts.com)

NOTICE: CONFIDENTIAL AND PRIVILEGED INFORMATION - This email may contain confidential and privileged material for the sole use of the intended recipient(s). Any review, distribution or disclosure by others is strictly prohibited. If you are not the intended recipient (or authorized to receive for the recipient), please contact the sender by reply email and delete all copies of this message. Any tax advice contained in this email was not intended to be used, and cannot be used, by you (or any other taxpayer) to avoid penalties under the Internal Revenue Code of 1986, as amended.

---

**From:** Alex Villanueva <[sheriffvillanueva33@gmail.com](mailto:sheriffvillanueva33@gmail.com)>

**Sent:** Wednesday, February 8, 2023 5:09 PM

**To:** Christine Diaz-Herrera <[cdiazherrera@sandersroberts.com](mailto:cdiazherrera@sandersroberts.com)>

**Subject:** [External] Re: Administrative Investigation Interview Request

Not currently represented. Send me a brief synopsis and questions you'd like me to answer.

Alex

On Wed, Feb 8, 2023 at 10:18 AM Christine Diaz-Herrera <[cdiazherrera@sandersroberts.com](mailto:cdiazherrera@sandersroberts.com)> wrote:

Good Morning Mr. Villanueva,

I wanted to follow up regarding my request to schedule an interview with you. However, pursuant to the California Rules of Professional Conduct (Rule 2-100) I am unable to communicate with you directly if you are currently represented by an attorney. Do you have an attorney representing you in this matter? If so, please provide me with their contact information so that I may speak with them. Thank you.

Best,

Christine



**Christine Diaz-Herrera,** ATTORNEY AT LAW

[cdiazherrera@sandersroberts.com](mailto:cdiazherrera@sandersroberts.com)

**Sanders Roberts LLP**

1055 West 7th Street, Suite 3200 | Los Angeles, CA 90017

**p** 213 426 5000 **x**6889 | **f** 213 234 4581 | [sandersroberts.com](https://sandersroberts.com)

NOTICE: CONFIDENTIAL AND PRIVILEGED INFORMATION - This email may contain confidential and privileged material for the sole use of the intended recipient(s). Any review, distribution or disclosure by others is strictly prohibited. If you are not the intended recipient (or authorized to receive for the recipient), please contact the sender by reply email and delete all copies of this message. Any tax advice contained in this email was not intended to be used, and cannot be used, by you (or any other taxpayer) to avoid penalties under the Internal Revenue Code of 1986, as amended.

---

**From:** Alex Villanueva <[sheriffvillanueva33@gmail.com](mailto:sheriffvillanueva33@gmail.com)>

**Sent:** Thursday, January 12, 2023 11:23 AM

**To:** Christine Diaz-Herrera <[cdiazherrera@sandersroberts.com](mailto:cdiazherrera@sandersroberts.com)>

**Subject:** Re: Administrative Investigation Interview Request

Send me the synopsis and questions first and I'll take it from there

On Mon, Jan 9, 2023 at 2:48 PM Christine Diaz-Herrera <[cdiazherrera@sandersroberts.com](mailto:cdiazherrera@sandersroberts.com)> wrote:

Thank you for your response. Is there an attorney you would like me to contact directly? I am happy to forward my previous interview requests to your attorney.

Best,

Christine



**Christine Diaz-Herrera**, ATTORNEY AT LAW

[cdiazherrera@sandersroberts.com](mailto:cdiazherrera@sandersroberts.com)

**Sanders Roberts LLP**

1055 West 7th Street, Suite 3200 | Los Angeles, CA 90017

p 213 426 5000 x6889 | f 213 234 4581 | [sandersroberts.com](https://sandersroberts.com)

NOTICE: CONFIDENTIAL AND PRIVILEGED INFORMATION - This email may contain confidential and privileged material for the sole use of the intended recipient(s). Any review, distribution or disclosure by others is strictly prohibited. If you are not the intended recipient (or authorized to receive for the recipient), please contact the sender by reply email and delete all copies of this message. Any tax advice contained in this email was not intended to be used, and cannot be used, by you (or any other taxpayer) to avoid penalties under the Internal Revenue Code of 1986, as amended.

---

**From:** Alex Villanueva <[sheriffvillanueva33@gmail.com](mailto:sheriffvillanueva33@gmail.com)>

**Sent:** Monday, January 9, 2023 2:47 PM

**To:** Christine Diaz-Herrera <[cdiazherrera@sandersroberts.com](mailto:cdiazherrera@sandersroberts.com)>

**Subject:** Administrative Investigation Interview Request

I received two certified letters regarding interview requests for incidents that allegedly happened in March of last year. In order to properly respond, I will ask you to submit your questions in writing, after providing a brief description of what the allegations are, and then I will reply with counsel. This is the first I have heard of anyone reaching out to me, so please use this email address for all communications.

Regards,

Alex Villanueva

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by Mimecast, a leader in email security and cyber resilience. Mimecast integrates email defenses with brand protection, security awareness training, web security, compliance and other essential capabilities. Mimecast helps protect large and small organizations from malicious activity, human error and technology failure; and to lead the movement toward building a more resilient world. To find out more, visit our website.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.



This email has been scanned for viruses and malware, and may have been automatically archived by Mimecast, a leader in email security and cyber resilience. Mimecast integrates email defenses with brand protection, security awareness training, web security, compliance and other essential capabilities. Mimecast helps protect large and small organizations from malicious activity, human error and technology failure; and to lead the movement toward building a more resilient world. To find out more, visit our website.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by Mimecast, a leader in email security and cyber resilience. Mimecast integrates email defenses with brand protection, security awareness training, web security, compliance and other essential capabilities. Mimecast helps protect large and small organizations from malicious activity, human error and technology failure; and to lead the movement toward building a more resilient world. To find out more, visit our website.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by Mimecast, a leader in email security and cyber resilience. Mimecast integrates email defenses with brand protection, security awareness training, web security, compliance and other essential capabilities. Mimecast helps protect large and small organizations from malicious activity, human error and technology failure; and to lead the movement toward building a more resilient world. To find out more, visit our website.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by Mimecast, a leader in email security and cyber resilience. Mimecast integrates email defenses with brand protection, security awareness training, web security, compliance and other essential capabilities. Mimecast helps protect large and small organizations from malicious activity, human error and technology failure; and to lead the movement toward building a more resilient world. To find out more, visit our website.

# EXHIBIT 25



# LOS ANGELES COUNTY SHERIFF'S DEPARTMENT

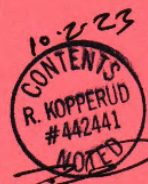
*"A Tradition of Service Since 1850"*

Incident Date: Between July 28, 2021, and March 2, 2022  
Department Knowledge: March 16, 2022  
Statute Date: March 15, 2023

## INTERNAL AFFAIRS BUREAU INVESTIGATIVE REPORT

# CONFIDENTIAL

**IAB #IV 2558101**



# TABLE OF CONTENTS

**Table of Contents**

IV 2558101

**AUDIO VIDEO TRACKING SHEET**

**PERSONNEL INVESTIGATION FORM**

**INVESTIGATIVE SUMMARY**

**INTERVIEW TRANSCRIPTS**

1-Complainant Esther Lim

**EXHIBITS**

- A** County Policy of Equity Report/Notification Form, ICMS #2022-112209
- B** Policy of Equality (POE) Report/Notification Form, #22-046.
- C** One (1) CD containing recordings of Subject Villanueva conducting interviews on Facebook live, and KFI Radio show

**MISCELLANEOUS DOCUMENTS**

- Request for IAB Investigation Memorandum from Commander Jason P. Wolak to Captain Ron Kopperud, dated June 27, 2022.
- Subject of Administrative Investigation Notification Form signed by Subject Alex Villanueva, dated June 29, 2022.
- Manual of Policy and Procedures:
  - 3-01/121.10: Policy of Equality - Discrimination
  - 3-01/121.15: Policy of Equality - Sexual Harassment
  - 3-01/121.20: Policy of Equality - Harassment (Other than Sexual)
  - 3-01/121.25: Policy of Equality - Third Party Harassment
  - 3-01/121.30: Policy of Equality - Inappropriate Conduct Toward Others
  - 3-01/121.35: Policy of Equality - Retaliation

IV 2558101

# AUDIO/VIDEO TRACKING SHEET

CONFIDENTIAL

COLA002123

EXHIBIT 25 - Page 460

# INTERNAL AFFAIRS BUREAU

## - Audio/Video Tracking Sheet -

### # IV 2558101

**Investigator's Name:** Lieutenant Ann Devane

**Total number of USB Flash Drives:** 0

**Total number of compact discs:** 2

**Total number of digital audio files:** 1

#### DIGITAL AUDIO FILES

Name
1-Complainant Esther Lim

#### DIGITAL MEDIA

<b>Transcripts</b>	One (1) Compact Disc containing: Audio recorded interview and interview transcript
<b>Exhibit C</b>	One (1) CD containing recordings of Subject Villanueva conducting interviews on Facebook live, and KFI Radio show

# PERSONNEL INVESTIGATION FORM

CONFIDENTIAL

COLA002125

EXHIBIT 25 - Page 462



COUNTY OF LOS ANGELES SHERIFF'S DEPARTMENT  
PERSONNEL INVESTIGATION

PAGE 1 OF 2

DATE 09/21/2023	No. OF SUBJECTS 1	UNIT(S) INVOLVED Executive Division	I.A.B. FILE No. IV 2558101
MANUAL SECTIONS VIOLATED (BY TITLE AND NO.) 3-01/121.10, POE-Discrimination; 3-01/121.15, POE-Harassment; 3-01/121.20, POE-Harassment (Other than Sexual); 3-01/121.25, POE-Third Party Harassment; 3-01/121.30, POE-Inappropriate Conduct To Others; 3-01/121.30, POE-Retaliation			
DATE, TIME, DAY OF OCCURRENCE Between July 28, 2021, and March 2, 2022		RELATED URN FILE No. IF APPLICABLE	
LOCATION OF OCCURRENCE Unknown			
SOURCE OF COMPLAINT: <input type="checkbox"/> COMMUNITY <input type="checkbox"/> SUPERVISION <input type="checkbox"/> W/C REPORT No. <input checked="" type="checkbox"/> OTHER SOURCES (SPECIFY) POE #: 22-046			

SUBJECT No. 1 OF 1	LAST NAME Alex	FIRST NAME Villanueva	M.I.	RANK OR TITLE Sheriff	EMP. No. 246296
UNIT OF ASSIGNMENT Executive Division		DATE ASSIGNED			
STATUS OF SUBJECT <input checked="" type="checkbox"/> CONTINUING ON DUTY <input type="checkbox"/> RELIEVED OF DUTY - REASSIGNED TO: <input type="checkbox"/> OTHER					
SEX Male	RACE Hispanic	HAIR Brown	EYES Brown	HEIGHT 510	WEIGHT 195
DATE OF HIRE 12/03/2018		DATE APPOINTED TO RANK 12/03/2018		D.O.B. 02/25/1963	
INTERVIEW TAPE RECORDED ON TAPE OF		SIDE <input type="checkbox"/> A <input type="checkbox"/> B		DATE TIME	
PREVIOUS FOUNDED INVESTIGATIONS					
DATE	I.A.B. FILE No.	MANUAL SECTION(S) VIOLATED		DISCIPLINE	
10/21/1992	3132	3-01/090.10: OPERATION OF VEHICLES		Written Reprimand	
09/15/1993	6069	3-01/090.10: OPERATION OF VEHICLES		Written Reprimand	
11/23/2015	2390479	3-01/030.10: OBEDIENCE TO LAWS, REGULATIONS; 3-01/040.97: SAFEGUARDING PERSONS IN CUSTODY; 3-01/050.10: PERFORMANCE TO STANDARDS		Written Reprimand	

CODE: C - COMPLAINANT, W - WITNESS		ADDITIONAL COMPLAINANTS, WITNESSES, OR SUBJECTS ON SUPPLEMENTAL PAGES <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
CODE C	No. 1 OF 1	LAST NAME Lim	FIRST NAME Esther
RESIDENCE ADDRESS Justice Deputy for Hilda Solis		SEX Female	RACE UNK
BUSINESS ADDRESS OR UNIT OF ASSIGNMENT 856 Kenneth Hahn Hall of Administration, LA, CA. 90012		D.O.B. Adult	
CDL OR LASD EMPLOYEE NO.		RES. PHONE (AREA CODE) ( ) BUS. PHONE (AREA CODE) (213) 974-4111	
INTERVIEW TAPE RECORDED ON TAPE OF		DATE 07/28/2022 TIME 1317	
CODE W	No. 1 OF 2	LAST NAME Pawlowski	FIRST NAME Veronica
RESIDENCE ADDRESS Justice Deputy for Sheila Kuehl		SEX Female	RACE UNK
BUSINESS ADDRESS OR UNIT OF ASSIGNMENT Los Angeles, Ca. 90013		D.O.B. Adult	
CDL OR LASD EMPLOYEE NO.		RES. PHONE (AREA CODE) ( ) BUS. PHONE (AREA CODE) ( )	
INTERVIEW TAPE RECORDED ON TAPE OF		DATE 08/04/2022 TIME	
PRIMARY INVESTIGATOR Sanders Roberts LLP		RANK LT	EMP. No. 478275
ASSISTING INVESTIGATOR Lieutenant Ann Devane		APPROVED DATE 09/26/2023	

SH-AD-669-3/15

IF ADDITIONAL SUBJECTS, WITNESSES, COMPLAINANTS OR DISCIPLINE HISTORIES, LIST ON CONTINUATION PAGES.

CONFIDENTIAL

COLA002126  
EXHIBIT 25 - Page 463

SHERIFF'S DEPARTMENT PERSONNEL INVESTIGATION  
COMPLAINANT / WITNESS CONTINUATION PAGE

I.A.B. FILE No. <b>IV2558101</b>						PAGE <b>2</b> OF <b>2</b>	
CODE: C - COMPLAINANT, W - WITNESS							
CODE	No. OF	LAST NAME	FIRST NAME	M.I.	SEX	RACE	D.O.B.
W	2	Coates	Kyla	-	Female	Unk	Adult
RESIDENCE ADDRESS						RES. PHONE (AREA CODE) ( )	
Justice and Mental Health Deputy for Janice Hahn							
BUSINESS ADDRESS OR UNIT OF ASSIGNMENT						CDL OR LASD EMPLOYEE NO.	
500 W. Temple Street Room 822, Los Angeles CA 90012						BUS. PHONE (AREA CODE) (213) 974-4444	
INTERVIEW TAPE RECORDED ON							
TAPE		OF		SIDE <input type="checkbox"/> A <input type="checkbox"/> B	DATE 08/01/2022		TIME Unk
CODE	No. OF	LAST NAME	FIRST NAME	M.I.	SEX	RACE	D.O.B.
RESIDENCE ADDRESS						RES. PHONE (AREA CODE) ( )	
BUSINESS ADDRESS OR UNIT OF ASSIGNMENT						CDL OR LASD EMPLOYEE NO.	
						BUS. PHONE (AREA CODE) ( )	
INTERVIEW TAPE RECORDED ON							
TAPE		OF		SIDE <input type="checkbox"/> A <input type="checkbox"/> B	DATE		TIME
CODE	No. OF	LAST NAME	FIRST NAME	M.I.	SEX	RACE	D.O.B.
	4						
RESIDENCE ADDRESS						RES. PHONE (AREA CODE) ( )	
BUSINESS ADDRESS OR UNIT OF ASSIGNMENT						CDL OR LASD EMPLOYEE NO.	
						BUS. PHONE (AREA CODE) ( )	
INTERVIEW TAPE RECORDED ON							
TAPE		OF		SIDE <input type="checkbox"/> A <input type="checkbox"/> B	DATE		TIME
CODE	No. OF	LAST NAME	FIRST NAME	M.I.	SEX	RACE	D.O.B.
RESIDENCE ADDRESS						RES. PHONE (AREA CODE) ( )	
BUSINESS ADDRESS OR UNIT OF ASSIGNMENT						CDL OR LASD EMPLOYEE NO.	
						BUS. PHONE (AREA CODE) ( )	
INTERVIEW TAPE RECORDED ON							
TAPE		OF		SIDE <input type="checkbox"/> A <input type="checkbox"/> B	DATE		TIME
CODE	No. OF	LAST NAME	FIRST NAME	M.I.	SEX	RACE	D.O.B.
RESIDENCE ADDRESS						RES. PHONE (AREA CODE) ( )	
BUSINESS ADDRESS OR UNIT OF ASSIGNMENT						CDL OR LASD EMPLOYEE NO.	
						BUS. PHONE (AREA CODE) ( )	
INTERVIEW TAPE RECORDED ON							
TAPE		OF		SIDE <input type="checkbox"/> A <input type="checkbox"/> B	DATE		TIME
CODE	No. OF	LAST NAME	FIRST NAME	M.I.	SEX	RACE	D.O.B.
RESIDENCE ADDRESS						RES. PHONE (AREA CODE) ( )	
BUSINESS ADDRESS OR UNIT OF ASSIGNMENT						CDL OR LASD EMPLOYEE NO.	
						BUS. PHONE (AREA CODE) ( )	
INTERVIEW TAPE RECORDED ON							
TAPE		OF		SIDE <input type="checkbox"/> A <input type="checkbox"/> B	DATE		TIME
CODE	No. OF	LAST NAME	FIRST NAME	M.I.	SEX	RACE	D.O.B.
RESIDENCE ADDRESS						RES. PHONE (AREA CODE) ( )	
BUSINESS ADDRESS OR UNIT OF ASSIGNMENT						CDL OR LASD EMPLOYEE NO.	
						BUS. PHONE (AREA CODE) ( )	
INTERVIEW TAPE RECORDED ON							
TAPE		OF		SIDE <input type="checkbox"/> A <input type="checkbox"/> B	DATE		TIME
CODE	No. OF	LAST NAME	FIRST NAME	M.I.	SEX	RACE	D.O.B.
RESIDENCE ADDRESS						RES. PHONE (AREA CODE) ( )	
BUSINESS ADDRESS OR UNIT OF ASSIGNMENT						CDL OR LASD EMPLOYEE NO.	
						BUS. PHONE (AREA CODE) ( )	
INTERVIEW TAPE RECORDED ON							
TAPE		OF		SIDE <input type="checkbox"/> A <input type="checkbox"/> B	DATE		TIME

CONFIDENTIAL

COLA002127  
EXHIBIT 25 - Page 464

# INVESTIGATIVE SUMMARY

CONFIDENTIAL

COLA002128

EXHIBIT 25 - Page 465

**CONFIDENTIAL**

**May 19, 2023**

TO: EDUARDO MONTELONGO,  
ASSISTANT LOS ANGELES COUNTY COUNSEL

FROM: SANDERS ROBERTS LLP

**INVESTIGATION REPORT – FORMER SHERIFF ALEX VILLANUEVA**

**1. INTRODUCTION**

County Counsel retained the law firm of Sanders Roberts LLP (“Sanders Roberts”) to conduct an independent investigation into complaints against Sheriff Alex Villanueva. Sanders Roberts conducted that investigation via witness interviews and a review of relevant documents. This report details the investigation’s factual findings with respect to Sheriff Alex Villanueva.

**2. ALLEGATIONS**

The allegations that form the basis of the complaints against Sheriff Alex Villanueva are as follows:

**ALLEGATION 1:** In various public appearances on Facebook Live and KFI Radio, Sheriff Alex Villanueva subjected several Board of Supervisors Justice Deputies to harassment on the basis of sex.

**ALLEGATION 2:** In various public appearances on Facebook Live and KFI Radio, Sheriff Alex Villanueva subjected several Board of Supervisors Justice Deputies to harassment on the basis of race/ethnicity/ancestry/national origin.

**ALLEGATION 3:** In various public appearances on Facebook Live and KFI Radio, Sheriff Alex Villanueva subjected several Board of Supervisors Justice Deputies to harassment and retaliation on the basis of age.

**3. APPLICABLE POLICIES AND GUIDELINES**

**Los Angeles County Board of Supervisors Board Policy, Chapter 9 – Personnel - 9.015 - County Policy of Equity**

**THE POLICY.** All County of Los Angeles (County) employees are required to conduct themselves in accordance with the entirety of this County Policy of Equity (Policy), and all applicable local, county, state, and federal laws.

**PURPOSE.** This Policy is intended to preserve the dignity and professionalism of the workplace as well as protect the right of employees to be free from discrimination, unlawful harassment, retaliation and inappropriate conduct toward others based on a protected status. Discrimination, unlawful harassment, retaliation and inappropriate conduct toward others based on a protected status, are contrary to the values of the County. The County will not tolerate unlawful discrimination on the basis of sex, race, color, ancestry, religion, national origin, ethnicity, age (40 and over), disability, sexual orientation, marital

Investigation Report  
Sheriff Alex Villanueva  
Date: May 19, 2023  
Page 2 of 11

status, medical condition or any other protected characteristic protected by state or federal employment law, nor will it tolerate unlawful harassment, or retaliation. As a preventive measure, the County also will not tolerate inappropriate conduct toward others based on a protected status even if the conduct does not meet the legal definition of discrimination or unlawful harassment. All County employees are responsible for conducting themselves in accordance with this Policy and its associated Procedures. Violation of the Policy and/or Procedures will lead to prompt and appropriate administrative action including, but not limited to, counseling, training, written warning, written reprimand, suspension, demotion, or discharge.

**COUNTY POLICY OF EQUITY PROHIBITED CONDUCT.** Each County employee is responsible for understanding and abiding by these definitions of prohibited conduct as they may impact any administrative process/proceeding for potential violations of this Policy and/or associated Procedures.

**COUNTY POLICY OF EQUITY UNLAWFUL HARASSMENT (OTHER THAN SEXUAL).** Unlawful harassment of an individual because of the individual's race, color, ancestry, religion, national origin, ethnicity, age, disability, sexual orientation, marital status, medical condition or any other protected characteristic protected by state or federal employment law is also discrimination and prohibited. Unlawful harassment is conduct which has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, offensive, or abusive work environment.

**Los Angeles County Board of Supervisors Board Policy, Chapter 9 – Personnel - 9.020 - Employee Accountability<sup>1</sup>**

“Each Department Head shall:

- Hold their employees accountable for actions that include being dishonest, untruthful, and/or which demonstrate a lack of integrity, consistent with Countywide requirements established by the Board of Supervisors, Director of Personnel, Chief Executive Officer, and Auditor Controller, County Code, Civil Service Rules, and departmental policies;
- Hold their employees, including those working in public safety, patient care, judicial affairs, and those holding fiduciary responsibilities, to high standards of honesty and conduct, which are of essential value to public servants;
- Act affirmatively to abate or prevent performance problems and document those problems when they occur;
- Ensure accountability as set forth in the Los Angeles County Charter, Civil Service Rules, and Countywide and departmental policies;
- Take timely and effective corrective action, commensurate with the offense, which may include remedial measures such as counseling or more formal action such as discipline up to and including discharge from County service; and;
- Retain employees in County service on the basis of the adequacy of their performance, correct inadequate performance, and separate from County service employees whose inadequate performance cannot be corrected.

Failure of an employee to perform their assigned duties so as to meet fully explicitly stated or implied standards of performance may constitute adequate grounds for discharge, reduction, or suspension. Where appropriate, such grounds may include, but are not limited to, qualitative as well as quantitative elements

---

<sup>1</sup> The Los Angeles County BOS Board Policy, Chapter 9 – Personnel - 9.020 - Employee Accountability can be accessed at [https://library.municode.com/ca/la\\_county\\_-\\_bos/codes/board\\_policy?nodeId=CH9PE\\_9.020EMAC](https://library.municode.com/ca/la_county_-_bos/codes/board_policy?nodeId=CH9PE_9.020EMAC).

Investigation Report  
Sheriff Alex Villanueva  
Date: May 19, 2023  
Page 3 of 11

of performance, such as failure to exercise sound judgment, failure to report information accurately and completely, failure to deal effectively with the public, and failure to make productive use of human, financial and other assigned resources. Grounds for discharge, reduction, or suspension may also include any behavior or pattern of behavior which negatively affects an employee's productivity, or which is unbecoming a county employee; or any behavior or condition which impairs an employee's qualifications for their position or for continued county employment."

#### 4. PROCEDURE

At the beginning of each interview, the interviewer advised each witness of the following: 1. That the witness's role is to tell the truth and reveal all relevant facts to the investigator; 2. That the witness should maintain confidentiality of the investigation; 3. That the witness must report any retaliation to the investigator; and 4. That the witness must not retaliate against any participant. The investigator then asked each witness whether s/he had any procedural questions.

To determine the merits of the allegations against former Sheriff Villanueva, the investigator interviewed the following persons:

NAME	DATES OF INTERVIEW	POSITION
Kyla Coates	08/04/22	Justice and Mental Health Deputy
Esther Lim	07/28/22	Justice Deputy
Veronica Pawlowski	08/01/22	Justice Deputy
Sheriff Alex Villanueva	N/A <sup>2</sup>	Los Angeles County Sheriff

#### 5. INVESTIGATIVE INTERVIEW SUMMARIES

##### Kyla Coates

On August 4, 2022, attorney Christine Diaz-Herrera interviewed Justice and Mental Health Deputy, Kyla Coates via video conference. Ms. Coates did not have a representative present.

Kyla Coates started with the County as an intern in January 2019. She was later hired as an Associate Justice Deputy in July 2019. In or around February 2020, Ms. Coates was promoted to her current position of Justice and Mental Health Deputy for Supervisor Janice Hahn. Ms. Coates is responsible for handling all matters relating to criminal justice and mental health. Ms. Coates also advises Supervisor Hahn on other issues, helps draft talking points and speeches, and represents Supervisor Hahn and staff on certain occasions. Prior to working for Supervisor Hahn, Ms. Coates taught at Odyssey school. She received her B.A. in Political Science and Statistics from UCLA in 2011 and her master's degree in public policy from USC in 2020.

Ms. Coates interacts regularly with the Sheriff's Department through a board liaison. She recently was

---

<sup>2</sup> The investigators sought repeatedly to schedule an interview with Sheriff Villanueva. Sheriff Villanueva repeatedly ignored such scheduling requests, but ultimately agreed to sit for an interview on the condition that he be provided the investigator's questions ahead of time. The investigator declined that request and accordingly completed this investigation without an interview of Sheriff Villanueva.

Investigation Report  
Sheriff Alex Villanueva  
Date: May 19, 2023  
Page 4 of 11

scheduled to meet with the Supervisor and then-Sheriff Villanueva. However, she usually goes through the liaison or subject matter expert. She works with Bruce Chase and Brandon Corbett because they are in charge of jails. Vanessa Chow was the Sheriff's board liaison when Ms. Coates first started and now Christine Corrales has that role. Ms. Coates has a good working relationship with Mr. Chase, Mr. Corbett, and Ms. Corrales that is friendly and collegial.

#### Sheriff Villanueva Facebook Livestreams

Ms. Coates is aware of Sheriff Villanueva's commentary about the Justice Deputies during his Facebook live sessions. She had to stop listening to the session because they were so upsetting. For her mental health, Ms. Coates stopped listening and would only read the summaries of the sessions. Ms. Coates always kept up to date. She believed she received the summaries from the CEO's office. They were sent to each Board office.

Sheriff Villanueva did not mention Ms. Coates by name, but he often referenced the entire Justice Deputies group. He disparages the group and makes references to their age. He said they are "woke twenty-somethings that worship at the altar of wokeness." Ms. Coates said she is in her thirties and others are in their forties. Sheriff Villanueva has also made reference to their gender. He said that they are all women. Sheriff Villanueva said that the supervisors promote diversity, but the Justice Deputies are all women and unqualified.

Ms. Coates has listened to approximately 15 of his speeches. She also believes at least some of his Facebook live speeches have been transcribed by the CEO's office. Sheriff Villanueva appears to refer to the Justice Deputies about a third of the time he is talking via Facebook live. During those sessions he has referred to the age of the Justice Deputies, which is a lie that can easily be fact checked. He also says the Justice Deputies are all female even though Supervisor Mitchell has two male Justice Deputies. It has stuck out to Ms. Coates that Sheriff Villanueva has chosen to make comments that are "straight up lies" and have nothing to do with their policies.

In the last few years Sheriff Villanueva has blamed the Board for defunding his department. She believes his motivation has been to get support for himself as an elected official. She said that anytime they tried to introduce transparency he would attack. She believes that his discussion about defunding the Sheriff's Department is part of his overall attack on the Board. Ms. Coates did not think Sheriff Villanueva had done any Facebook live sessions for a small period of time and had been relatively quiet compared to the past.

#### Comments Regarding Supervisors

Sheriff Villanueva acted especially awful to Supervisor Mitchell and Supervisor Solis. She also believed he mentioned Esther Lim by name in public settings. He made negative comments to Ms. Coates in front of Supervisor Hahn. Sheriff Villanueva had requested a quarterly check-in. They had a check-in during November 2021 and another in January/ February 2022. It was a virtual meeting. He said Supervisor Hahn was defunding him. Ms. Coates told him he felt underfunded, but he was not being defunded, let's get that out in the clear. Sheriff Villanueva pointed at Ms. Coates and said, "I can tell from your age you are one of those people that hate the police and want to defund us." Ms. Coates said, "that is not true, you don't know me or my personal background." The conversation upset Ms. Coates and she couldn't believe what he said to her. It was just the three of them in the meeting. Ms. Coates could not recall if Supervisor Hahn responded. He insulted Supervisor Hahn to her face, that is just what he does. Supervisor Kuehl has called him out on his behavior before.



Investigation Report  
Sheriff Alex Villanueva  
Date: May 19, 2023  
Page 5 of 11

Sheriff Villanueva also said they were all twenty-year old woke, just out of college, and never had a job in their lives. Ms. Coates told Sheriff Villanueva that he did not know her and what he said about her was untrue. Sheriff Villanueva said it was semantics. He also told her, "I can see from your age that you are one of those people that worships at altar of wokeness, hates the police and wants to defund the police." Ms. Coates was offended because he was discrediting her experiences. Ms. Coates has worked hard and is not anti-police. Sheriff Villanueva also said they were all women. In response Ms. Coates asked him even if they were all women, what was he implying. He did not reply.

Ms. Coates said that Sheriff Villanueva's actions have not impacted her individually. She did not think he ever mentioned her name personally. He usually shares BOS pictures and the general email for Supervisor Kuehl. She said she was lucky she hasn't actually been harmed because of Sheriff Villanueva's words.

#### Treatment of Women of Color

Ms. Coates was present when Sheriff Villanueva said something negative to Supervisor Kuehl. She told him he had to stop insulting her because it is rude and unproductive. He responded, "I'll stop saying bad things about you publicly if you end the hiring freeze. I'll stop being mean to you."

Sheriff Villanueva also said several negative things about Supervisor Mitchell. However, she could not recall any specific comments he made about her. During a Facebook Live session, he called Supervisor Hilda Solis "La Malinche," because she doesn't support law enforcement which makes her a traitor to her own people.

Ms. Coates recalled reading in a transcript that Sheriff Villanueva said he should take the BOS out to the shed and beat them during one of his Facebook Live sessions. She said Sheriff Villanueva said really inappropriate things about the supervisors.

#### Commentary on KFI Radio Station

Ms. Coates listened to a few of Sheriff Villanueva's appearances of the radio station KFI. He talked about Justice Deputy Esther Lim during one show. The radio personalities said her name. They made it sound like a huge bombshell of a story because she had all these tweets that made commentary on public affairs.

#### Community Town Hall February 2022

Ms. Coates did not attend the Town Hall Meeting in February 2022. Usually, the field deputy attends those events. To her knowledge, Sheriff Villanueva made similar comments at this event. At that point it was old news because he was always saying similar disparaging comments. She did not believe he made any comments about Ms. Lim at this event. She recalled his comments were more focused on the supervisors. Jennifer L. and Lauren U. told her about Sheriff Villanueva's comments at the townhall meetings. The comments about the Justice Deputies were usually on Instagram and Facebook Live events.

#### Esther Lim

On August 12, 2022, attorney Christine Diaz-Herrera interviewed Justice Deputy, Esther Lim, via Teams video conference. Ms. Lim did not have a representative present.



Investigation Report  
Sheriff Alex Villanueva  
Date: May 19, 2023  
Page 6 of 11

### Background

Esther Lim has worked for Los Angeles County Supervisor, Hilda Solis, since June of 2020 as her Justice Deputy. Ms. Lim handles Supervisor Solis's public safety and justice portfolio, which includes the Sheriff, Probation, and District Attorney's office. Lim serves as a liaison for Supervisor Solis with oversight entities and engages with community members, monitors jails and juvenile facilities. As part of her duties, Ms. Lim goes into both jail and juvenile hall facilities to observe. Ms. Lim reports issues to oversight entities and Board of Supervisors. Ms. Lim works with oversight entities such as probation oversight, civil brand commission, Office of Inspector General, and the Sheriff Civilian Oversight Commission. Ms. Lim reports to Chief of Staff Cindy Chan and Supervisor Solis. Ms. Lim previously worked at the ACLU of Southern California for almost a decade. While at the ACLU, she focused on issues such as law enforcement accountability and jail conditions. She also interacted with the LA County Sheriff's Department and the OIG. Ms. Lim received a B.S. in Criminal Justice from Cal State Long Beach in 2006. She received a Master's in Social Work from USC in 2010. She states that there are at least four incidents that have occurred.

### Sheriff Alex Villanueva

Sheriff Villanueva knows who Ms. Lim is. They had a working relationship when she worked at the ACLU. She acknowledged that in her previous role at the ACLU she was critical of Sheriff Villanueva. Further, she said that she had been critical of Sheriff Villanueva in her public social media posts. In Feb 2021, Sheriff Villanueva wrote a letter addressed to Supervisor Solis and cc'ed the BOS and CEO. Ms. Lim considered his letter to be harassment. The letter discussed Ms. Lim's social media posts and called for opening up an investigation of her social media accounts. Ms. Lim believed the Sheriff's request was unjustified.

Ms. Lim acknowledged being critical of Sheriff Villanueva in the past. She said it was part of accountability from the BOS. When Sheriff Villanueva does not collaborate, they are critical. The BOS has governance over County departments, including the Sheriff's Department. Even though Sheriff Villanueva is elected, there is still a supervisory authority. Accountability could be brought up in a board meeting or through motions. Oversight entities will issue subpoenas to force the sheriff or his representative to attend a meeting. During one Board meeting discussed by Sheriff Villanueva, the Board heard from a constituent being harassed by deputies.

Sheriff Villanueva referred to Ms. Lim and other Justice Deputies as twenty-somethings that don't know any better. However, Ms. Lim is not in her twenties. She found Sheriff Villanueva's comments disparaging because he was putting down her education and intellectual level. Ms. Lim was aware of this Facebook Live session because sometimes the County's communication department sends her a transcript of Sheriff Villanueva's Facebook live session.

Because Ms. Lim is a Justice Deputy, she frequently attends events where Sheriff Villanueva is present. If Sheriff Villanueva is going to be there, she is typically assigned to go. There was a community town hall meeting where they recognized each other. He said, "Esther go tell your boss that I want to debate her." This was a meeting that occurred in 2021. Ms. Lim has seen him a handful of times at events. The board meetings are virtual, and Sheriff Villanueva has attended virtually. During those meetings he has made disparaging comments about Justice Deputies. She believes he made negative comments about the Justice Deputies during public comments he made on July 27th and 28th.

Investigation Report  
Sheriff Alex Villanueva  
Date: May 19, 2023  
Page 7 of 11

July 28, 2021 Statement on Facebook Live

Sheriff Villanueva conducted a Facebook Live session in uniform and discussed a motion Ms. Lim drafted on behalf of Supervisor Hilda Solis. The motion he was referencing had been put forward the day before on July 27, 2021. In video he held and read from the motion. Sheriff Villanueva did not approve of the motion and said he did not think the drafter realized the implications of the motion. Motions are often drafted by deputies on behalf of their respective Supervisors.

October 6, 2021 Facebook Live Session

During a Facebook Live session Sheriff Villanueva said he heard Ms. Lim "loud and clear" and then stated that he, was "pretty sure the flunkies are going to listen and get back to you." Ms. Lim said it would have been the Justice Deputies to respond to the issues he raised because they are a liaison to Sheriff Villanueva.

February 16, 2021 Statement to Janice Hahn's Health Deputy

A Justice Deputy told Ms. Lim that Sheriff Villanueva said all the Supervisors have twenty-five year olds right out of college writing their motions. Ms. Lim found this to be an offensive and ageist comment. She believes it is ageist because it assumes the Justice Deputies are right out of college and it minimizes their education and intellect. Ms. Lim found his comments particularly troublesome given the weight of his words as the Sheriff of Los Angeles County being made on a public platform heard by people that could become violent or dangerous. Ms. Lim had concerns that someone listening to Sheriff Villanueva could choose to retaliate against the Justice Deputies based on his statements. She believed Sheriff Villanueva's comments about her, and the other Justice Deputies could pose a safety concern. Lastly, his comments were "incredibly unprofessional."

Ms. Lim has not observed an uptick in negative comments towards her after Sheriff Villanueva's comments because she does not use social media anymore. However, there are disparaging comments made by people that watch Sheriff Villanueva's Facebook page live sessions. Ms. Lim recalled one time when someone directed a comment toward her during a Facebook live session because she made remarks at an event where Supervisor Solis issued a 25K reward in three homicide investigations.

History of Intimidation of Women of Color

Sheriff Villanueva has made multiple negative and misogynistic comments about the supervisors. On one occasion he said he wanted to take all of them back to the shed and beat them. He used the racist and sexist term, "La Malinche" against Supervisor Solis. He has also made negative comments about Supervisor Holly Mitchell, though Ms. Lim could not recall exactly what he said. She reported that Sheriff Villanueva makes comments like, "they worship at the altar of wokeness." He also harassed the former County CEO who was also a minority woman. He opened up a criminal investigation to intimidate her. Ms. Lim accused Sheriff Villanueva of harassing the Oversight Committee. She said that Sheriff Villanueva has tried to attack anyone with oversight of him. He has attempted to open arbitrary criminal investigations to silence people. Ms. Lim has drafted many motions about accountability and as a result, Sheriff Villanueva "goes after" Ms. Lim and Supervisor Solis. She said that Sheriff Villanueva goes after the BOS in every one of his Facebook Live sessions. During one Facebook Live session, Sheriff Villanueva said they should look into why there are no female Justice Deputies. Ms. Lim disputes this because there is a male Justice Deputy in the second district.

Investigation Report  
Sheriff Alex Villanueva  
Date: May 19, 2023  
Page 8 of 11

Letters Requesting Discipline of Ms. Lim for Her Social Media Commentary

According to Ms. Lim, Sheriff Villanueva targeted her like he had targeted other Asian women. He authored two letters, one in February 2021 and the other in March 2022 about Ms. Lim's social media posts on Twitter. Sheriff Villanueva sent a letter to the BOS. In that letter, he included screenshots of her twitter posts, which were public. She made the posts while she was employed at her former employer, the ACLU, where she was encouraged to use social media.

Ms. Lim also believes Sheriff Villanueva shared his letter about her with KFI Radio. He received coverage of his letters, but the coverage ended there. The Office of the Inspector General (OIG) got involved with asking for justification for investigating an employee's personal social media. The OIG never got any information as to why the investigation was conducted. Ms. Lim only knows that they went through her social media accounts. Sheriff Villanueva wrote Ms. Lim's boss, Supervisor Solis, and tried to use what Ms. Lim wrote in personal social media accounts to get her terminated in 2021 and 2022. Ms. Lim did not believe she violated any County policy with her social media posts. However, she decided that she would no longer use her personal social media accounts or Twitter. Ms. Lim knows there are other deputies with social media accounts. Sheriff Villanueva complained that Ms. Lim was not fired and asked why the supervisor did not discipline her.

**Veronica Pawlowski**

On August 1, 2022, attorney Christine Diaz-Herrera interviewed Justice Deputy, Veronica Pawlowski via Teams video conference. Ms. Pawlowski did not have a representative present.

Background

Veronica Pawlowski has worked for the County of Los Angeles since 2012. She served as Supervisor Sheila Kuehl's Justice Deputy for two and a half years. Previously she held the position of Special Counsel to the Board of Supervisors on Child Welfare issues. Subsequent to that, she held a position at County Counsel where she advised the Department of Children and Family Services; the Probation Department; and the Los Angeles Homeless Services Authority. Pawlowski has been an attorney for 19 years. She received her B.A. in Political Science and Communications from USC in 1997 and her law degree from Boston College in 2000.

While she worked at County Counsel, Ms. Pawlowski worked on ordinances that give bodies of oversight their authority. She was really aware about how that relationship is supposed to work. The Supervisor saw Ms. Pawlowski as a subject matter expert on ordinances because she knew them better than anyone else.

Interaction with Sheriff's Department

Most of Ms. Pawlowski's interactions with the Los Angeles County Sheriff's Department ("Sheriff's Department") is at the Assistant Sheriff level. Her work with the Sheriff's Department has been very focused on the jails. Supervisor Sheila Kuehl ("Supervisor Kuehl") called for closure of a main jail in Los Angeles County. Much of Ms. Pawlowski's work has been focused on this issue. Ms. Pawlowski has dedicated a lot of time to learning how the jail operates. The Sheriff's Department has a board liaison and a board liaison team. This team advises Supervisor Kuehl's office of critical incidents.

As part of her work, Ms. Pawlowski meets in "clusters" that are attended by the other Justice Deputies and County staff with subject matter knowledge of the matters to be placed on the Board of Supervisor

Investigation Report  
Sheriff Alex Villanueva  
Date: May 19, 2023  
Page 9 of 11

meeting agenda. These meetings are scheduled by the CEO's office. Each week the cluster meeting agenda is based who is on the Board of Supervisors meeting agenda. To facilitate these meetings the CEO invites the relevant County departments to speak on items noticed in the Board of Supervisors meeting agenda. Who is speaking at cluster depends on the items being considered that week. All five BOS offices are represented, and the public is also allowed to attend.

The public safety cluster gives Ms. Pawlowski a preview of the issues to be raised and gives her an opportunity to ask questions on behalf of Supervisor Kuehl. These sessions help Ms. Pawlowski and the other Justice Deputies to make recommendations.

Ms. Pawlowski also attends informal briefings that are not open to the public. To address issues related to the pandemic, she used to attend a covid related briefing once a week.

#### Interaction with Sheriff Alex Villanueva

Ms. Pawlowski does not have to interact directly with the Sheriff Villanueva, but that is by deliberate design. She sat in on a few meetings with the Sheriff Villanueva and Supervisor Kuehl, but it was not required. She sat in on these meetings "maybe two or three times."

Sheriff Villanueva has not used abusive language directly toward Ms. Pawlowski or Supervisor Kuehl. However, during his Facebook live sessions there was a time period when he repeatedly talked about the fact the Board of Supervisors is comprised entirely of women. Similarly, he also made comments about the gender composition of the Justice Deputies.

#### Sheriff's Alex Villanueva's Facebook Live Sessions

Part of Ms. Pawlowski's responsibilities on behalf of her bosses is to sit in on meetings and keep them informed about what is going on in her portfolio. Ms. Pawlowski started to listen to Sheriff Villanueva's Facebook live sessions to alert her bosses if he said anything newsworthy. Ms. Pawlowski could not recall how many Sheriff Villanueva Facebook live sessions she has listened to. She has listened to them both live and via a recorded session. Ms. Pawlowski has listened to "just about every session" since Sheriff Villanueva started doing them.

In the beginning it was just Ms. Pawlowski listening and taking notes. Somewhere along way, she started to receive summaries of the sessions from the CEO's office, Countywide Communications Unit. Ms. Pawlowski did not know who sent them because she would receive them from Supervisor Kuehl's Communications Deputy. Lenny McGuire is in charge.

#### Sheriff Villanueva's Comments About the Justice Deputies

Initially Sheriff Villanueva called the Justice Deputies disparaging things. He said they don't know anything about the law. It became so much that Ms. Pawlowski started to "tune his comments out." Sheriff Villanueva called the Justice Deputies "woke twenty-year-old flunkies." During another exchange Sheriff Villanueva said it was "all these women running the show." He asked the question, "what's up with it being all women?" He said it was not just the Supervisors, and that all the Justice Deputies were "young twenty something woke and dumb women." Ms. Pawlowski was offended because Sheriff Villanueva portrayed them as puppets of the Supervisors who are young and dumb and don't know anything. Ms. Pawlowski said she is 46 years old and has a 4-year-old child. She is of Mexican descent and her children are of mixed race. Ms. Pawlowski said she is a proud child of immigrants. She said to

Investigation Report  
Sheriff Alex Villanueva  
Date: May 19, 2023  
Page 10 of 11

portray her as dumb, naive and not understanding during Sheriff Villanueva's Facebook live sessions was incredibly offensive to her.

Ms. Pawlowski considered filing a CPOE complaint. She has been in County for a long time and has experienced the process first-hand. She said that she does not have a lot of faith in the process. Ms. Pawlowski considered going to the press to tell them who the Justice Deputies really are. She pointed out that one of the Justice Deputies is male contrary to Sheriff Villanueva's remarks. Ms. Pawlowski said the press could do a write up about the situation, but she was "blown off" and told it was not worth the time despite how he was portraying all of them.

Ms. Pawlowski speculated that Sheriff Villanueva was trying to undermine the Justice Deputies and get to the Supervisors. She had concerns that his comments about her and the others would influence the community and his deputies. She drives a County car and lives in a small town where the LA County Sheriff's deputies are very present. The Justice Deputies talked about this issue as a group and wondered if Sheriff Villanueva was gathering information on them. They had concerns that he would look up their addresses or try to impact them in some way. Ms. Pawlowski has not personally received any emails or texts based on Sheriff Villanueva's comments about the Justice Deputies. However, the community she lives in is different. She lives in one of the only conservative parts of the County. She noticed that she would get a reaction if she told anyone that she works for Supervisor Kuehl. They would ask her, "isn't your boss anti-Sheriff?"

Although she was not there and did not hear it personally, Ms. Pawlowski is aware of a recording of a Sheriff Villanueva event where he called the Justice Deputies a "bunch of flunkies." These comments occurred during a period of time when he was holding community town halls. The townhall occurred in East LA. Ms. Pawlowski did not know who recorded the event. She thought the recording was taken by a staff member.

#### Esther Lim

Ms. Pawlowski reported that Sheriff Villanueva singled out Justice Deputy Esther Lim and highlighted her twitter posts. He wrote a letter to BOS to investigate and fire her. He also wrote another letter to the BOS saying that they had a fascist woman working on the board. Ms. Pawlowski said she saw that this affected Ms. Lim.

#### History of Intimidation of Women of Color

Ms. Pawlowski reported that Sheriff Villanueva referred to Supervisor Hilda Solis as "La Malinche" in one of his Facebook posts. La Malinche is commonly known as a traitor. He did not explain why he called her this name. At the time, Supervisor Solis took up a BOS motion and the Sheriff "ranted" about how the Supervisor was "full of it." He made comments that he would expect support from the one Latina on the BOS, but Supervisor Solis did not support him.

Ms. Pawlowski said that Sheriff Villanueva also made derogatory comments about Supervisor Kuehl. He had a whole commentary about Patty Giggins to the COC Commission in which he accused her of collusion or an inappropriate granting of funds. He referred to her as corrupt several times.

Similarly, he intimated that Supervisor Holly Mitchell was corrupt and improperly benefitted from some decisions she made.

Investigation Report  
Sheriff Alex Villanueva  
Date: May 19, 2023  
Page 11 of 11

Max Huntsman

Ms. Pawlowski reported that Sheriff Villanueva made comments about Max Huntsman, Inspector General, “nonstop.” Sheriff Villanueva called him “Gustav Hunstman,” alluding that he is “some kind of Nazi.” She said that Sheriff Villanueva has made his comments in writing. Ms. Pawlowski believes Sheriff Villanueva referenced it in a letter and does not hide it. Sheriff Villanueva referred to Mr. Huntsman and said his real name was “Gustav.” Ms. Pawlowski believed Sheriff Villanueva’s comments were intended to be about Mr. Huntsman’s national origin.

KFI Radio Talk Show

Ms. Pawlowski reported that Sheriff Villanueva also made comments about the Justice Deputies on the radio station, KFI. Ms. Pawlowski said everything blended together. She listened to his comments in the different forums giving him space. She could not distinguish one from the other. They listened to all of his comments across various media platforms. Ms. Pawlowski believed some of it was captured and could be located by Lenny McGuire.

**6. DOCUMENTARY EVIDENCE**

- a. July 28, 2021 Facebook Live Session**
- b. October 6, 2021 Facebook Live Session**
- c. August 29, 2021 KFI Radio Show**



**Justice Deputy Kyla Coates**

**Interview: August 4, 2022**

**Background**

Kyla Coates started with the County as an intern in January 2019. She was later hired as an Associate Justice in July 2019. In or around February 2020, Ms. Coates was promoted to her current position of Justice and Mental Health Deputy for Supervisor Janice Hahn. Ms. Coates handles all matters of criminal justice and mental health. Ms. Coates also advises Supervisor Hahn on other issues, drafts talking points and speeches, and represents Supervisor Hahn and staff on certain occasions. Prior to working for Supervisor Hahn, Ms. Coates taught at Odyssey school. She received her B.A. in Political Science and Statistics from UCLA in 2011 and her master's degree from USC in Public Policy in 2020.

Ms. Coates interacts regularly with the Sheriff's Department through a board liaison. She recently was scheduled to meet with the Supervisor and Sheriff Villanueva. In most cases, however, she goes through a liaison or subject matter expert. She works with Ruth Chase and Brandon Corbett because they are in charge of jails. Vanessa Chow was the Sheriff board liaison when Ms. Coates started and now Christine Corrales has that role. Ms. Coates has a positive working relationship with Ms. Chase, Mr. Corbett, and Ms. Corrales that is friendly and collegial.

**Sheriff Villanueva Facebook Livestreams**

Ms. Coates is aware of Sheriff Villanueva's commentary about justice deputies during his Facebook live sessions. She had to stop listening to the sessions because they were so upsetting. For her mental health, Ms. Coates stopped listening and only read the session summaries. Ms. Coates always kept updated. She believed she had received the summaries from the CEO's office. They were sent to each Board office.

Sheriff Villanueva did not mention Ms. Coates by name, but often referenced the entire justice deputies group. He disparages the group and references their age. He said they are "woke 20 somethings that worship at altar of wokeness." Ms. Coates explained that she is in her 30s and others are in their 40s. Sheriff Villanueva has also made reference to their gender. He said they were all women. Sheriff Villanueva said that the supervisors promote diversity, but the justice deputies are all women and unqualified.

Ms. Coates has listened to approximately 15 of his speeches. She also believes at least some of his Facebook Live speeches have been transcribed by the CEO's office. Sheriff Villanueva refers to justice deputies about a third of the time he talks via Facebook Live. During those sessions he referred to the age of the justice deputies, which is a lie that can easily be fact checked. He also says the justice deputies are all female even though Supervisor Mitchell has two male justice deputies. It has stood out to Ms. Coates that Sheriff Villanueva has chosen to make comments that are straight up lies and have nothing to do with their policies.

In the last few years Sheriff Villanueva has blamed the Board for defunding his department. She believes his motivation is to get support for himself as an elected official. Any time they tried to introduce transparency he would attack. His discussion about defunding the Sheriff's Department is part of his overall attack on the Board. Ms. Coates did not think Sheriff Villanueva had done any Facebook live sessions for a small period of time and had been relatively quiet compared to the past.

#### Comments Regarding Supervisors

Sheriff Villanueva acted especially awful towards Supervisor Mitchell and Supervisor Solis. She also believed he had mentioned Esther Lim by name in public settings. He made negative comments about Ms. Coates in front of Supervisor Hahn. Sheriff Villanueva requested quarterly check-ins. They had a check-in during November 2021 and another in January/ February 2022. It was a virtual meeting. He said Supervisor Hahn was defunding him. Ms. Coates told him he felt underfunded, but he was not being defunded, let's get that out in the clear. Sheriff Villanueva pointed at Ms. Coates and said, "I can tell from your age you are one of those people that hate the police and want to defund us." Ms. Coates said, "that is not true, you don't know me or my personal background." The conversation upset Ms. Coates and she couldn't believe what he said to her. It was just the three of them in the meeting. Ms. Coates could not recall if Supervisor Hahn responded. He insulted Supervisor Hahn to her face, that is just what he does. Supervisor Kuehl has called him out on his behavior before.

Sheriff Villanueva also said they were all 20-year old woke, just out of college, and never had a job in their lives. Ms. Coates told Sheriff Villanueva that he did not know her and what he said about her was untrue. Sheriff Villanueva said it was semantics. He also told her, "I can see from your age that you are one of those people that worships at altar of wokeness, hates the police and wants to defund the police." Ms. Coates was offended because he was discrediting her experiences. Ms. Coates has worked hard and is not anti-police. Sheriff Villanueva also said they were all women. In response Ms. Coates asked him even if they were all women, what was he implying. He did not reply.

Ms. Coates said that Sheriff Villanueva's actions have not impacted her individually. She did not think he mentioned her name personally. He usually shares BOS pictures and the general email for Supervisor Kuehl. She said she was lucky she hadn't actually been harmed because of Sheriff Villanueva's words.

#### Women of Color

Ms. Coates was present when Sheriff Villanueva said something negative to Supervisor Kuehl. She told him he had to stop insulting her because it is rude and unproductive. He responded, "I'll stop saying bad things about you publicly if you end the hiring freeze. I'll stop being mean to you."

Sheriff Villanueva also said several negative things about Supervisor Mitchell. However she could not recall any specific comments he made about her. During a Facebook Live



session he called Supervisor Hilda Solis "La Malinche," because she doesn't support law enforcement which makes her a traitor to her own people.

Ms. Coates recalled reading in a transcript that Sheriff Villanueva said he should take the BOS out to the shed and beat them. This was during one of his Facebook Live sessions. She said Sheriff Villanueva said inappropriate things about supervisors.

KFI

Ms. Coates listened to a few of Sheriff Villanueva's appearances on the radio station KFI. He talked about justice deputy Esther Lim during one show. Radio personalities mentioned her name. They made it sound like a huge bombshell of a story because she had all these tweets that commented on public affairs.

Community Town Hall February 2022

Ms. Coates did not attend the Town Hall Meeting in February 2022. Usually the field deputy attends those events. To her knowledge, Sheriff Villanueva made similar comments at this event. At that point it was old news because he always said similar disparaging comments. She did not believe he commented about Ms. Lim at this event. She recalled his comments were more focused on the supervisors. Jennifer L. and Lauren U. told her about Sheriff Villanueva's comments at the townhall meetings. The comments about justice deputies were usually on Instagram and Facebook Live events.

## **Justice Deputy Veronica Pawlowski**

**Interview: August 11, 2022**

### Background

Veronica Pawlowski has worked for the County of Los Angeles since 2012. She served as Supervisor Sheila Kuehl's Justice Deputy for two and a half years. Previously she held the position of Special Counsel to the Board of Supervisors on Child Welfare issues. Subsequently she held the position of County Counsel where she advised the Department of Children and Family Services; the Probation Department; and the Los Angeles Homeless Services Authority. Pawlowski has been an attorney for 19 years. She received her B.A. in Political Science and Communications from USC in 1997 and her law degree from Boston College in 2000.

While she worked at County Counsel, Ms. Pawlowski worked on ordinances that give bodies of oversight their authority. She was really aware of how that relationship is supposed to function. The Supervisor saw Ms. Pawlowski as a subject matter expert on ordinances because she knew them better than anyone else.

### Interaction with Sheriff's Department

Most of Pawlowski's interactions with the Los Angeles County Sheriff's Department ("Sheriff's Department") are at the Assistant Sheriff level. Her work with the Sheriff's Department focuses on the jails. Supervisor Sheila Kuehl ("Supervisor Kuehl") called for the closure of the main jail in Los Angeles County. Much of Pawlowski's work has been focused on this issue. Pawlowski has dedicated a lot of time to learning how the jail operates. The Sheriff's Department has a board liaison and a board liaison team. This team advises Supervisor Kuehl's office of critical incidents.

As part of her work, Pawlowski meets in "clusters" that are attended by other justice deputies and County staff with subject matter knowledge of the matters to be placed on the Board of Supervisor meeting agenda. These meetings are scheduled by the CEO's office. Each week the cluster meeting agenda is based on who is on the Board of Supervisors meeting agenda. To facilitate these meetings the CEO invites the relevant county departments to speak on items noticed on the Board of Supervisors meeting agenda. Who is speaking at cluster depends on the items being considered that week. All five BOS offices are represented, and the public is also allowed to attend.

The public safety cluster gives Pawlowski a preview of the issues to be raised. It also gives her an opportunity to ask questions on behalf of Supervisor Kuehl. These sessions help Pawlowski and the other justice deputies make recommendations.

Pawlowski also attends informal briefings not open to the public. To address issues related to the pandemic, she attended a covid related briefing once a week.

#### Interaction with Sheriff Alex Villanueva

Ms. Pawlowski does not have to interact directly with Sheriff Villanueva, but that is by deliberate design. She attended a few meetings with Sheriff Villanueva and Supervisor Kuehl, but it was not required. She sat in these meetings two or three times.

Sheriff Villanueva has not used abusive language directly toward Ms. Pawlowski or Supervisor Kuehl. However, during his Facebook Live sessions there was a time period when he repeatedly talked about the fact that the Board of Supervisors is comprised entirely of women. Similarly, he also commented on the gender composition of justice deputies.

#### Sheriff's Alex Villanueva's Facebook Live Sessions

Part of Ms. Pawlowski's responsibilities are to sit in on meetings and keep her bosses informed about what is happening in her portfolio. Ms. Pawlowski started listening to Sheriff Villanueva's Facebook live sessions to alert her bosses if he said anything newsworthy. Ms. Pawlowski could not recall how many Sheriff Villanueva Facebook Live sessions she has listened to. She has listened to them live and via a recorded session. Ms. Pawlowski has listened to just about every session since Sheriff Villanueva started doing them.

At the beginning it was just Ms. Pawlowski listening and taking notes. Somewhere along the way, she started to receive summaries of the sessions from the CEO's office, Countywide Communications Unit. Ms. Pawlowski did not know who sent them because she would receive them from Supervisor Kuehl's Communications Deputy. Lenny McGuire is in charge.

#### Sheriff Villanueva's Comments About the Justice Deputies

Initially Sheriff Villanueva started to call the justice deputies disparaging things. He said they know nothing about the law. It became so much, Ms. Pawlowski started to tune his comments out. Sheriff Villanueva called them "Woke 20 year old flunkies". During another exchange Sheriff Villanueva said it was all these women running the show. He asked the question, "what's up with it being all women?" He said it was not just the Supervisors, all the justice deputies were young 20 something woke and dumb women. Ms. Pawlowski was offended because Sheriff Villanueva portrayed them as puppets of the Supervisors who are young and dumb and don't know anything. Ms. Pawlowski said she is 46 years old, and has a 4 year old child. She is of Mexican descent and her children are mixed race. Ms. Pawlowski said she is a proud child of immigrants. She said portraying her as dumb, naive and not understanding during Sheriff Villanueva's Facebook live sessions was incredibly offensive to her.

Ms. Pawlowski considered filing a CPOE complaint. She has been in the county for a long time and experienced the process first-hand. She has little faith in the process. Ms. Pawlowski considered speaking to the press to tell them who they really are. She

pointed out that one of the justice deputies is male contrary to Sheriff Villanueva's remarks. Ms. Pawlowski said the press could do a write up about situation, but she was blown off and told it was not worth the time despite how he was portraying all of them.

Ms. Pawlowski speculated that Sheriff Villanueva was trying to undermine the justice deputies and get to the Supervisors. She had concerns that his comments about her and the others would influence the community and his deputies. She drives a county car and lives in a small town where the LA County Sheriff's deputies are very present. The justice deputies talked about this issue as a group and wondered if Sheriff Villanueva was gathering information about them. They had concerns that he would look up their addresses or try to impact them in some way. Ms. Pawlowski has not personally received any emails or texts based on Sheriff Villanueva's comments about the justice deputies. However, the community she lives in is different. She lives in one of the only conservative parts of the county. When she told anyone she worked for Supervisor Kuehl, she noticed that there would be a reaction. They would ask her, "isn't your boss anti-sheriff?"

Although she was not there and did not hear it personally, Ms. Pawlowski is aware of a recording of a Sheriff Villanueva event where he called them a bunch of flunkies. These comments occurred during a period of time when he was holding community town halls. The town hall occurred in East LA. Ms. Pawlowski did not know who recorded the event. She thought the recording was taken by a staff member.

#### Esther Lim

Sheriff Villanueva singled out Justice Deputy Esther Lim and highlighted her Twitter posts. A letter was written to the Board of Supervisors (BOS) informing them that she should be investigated and fired. He also wrote another letter to the BOS saying they had a fascist woman working on the board. Ms. Pawlowski said she saw that this affected Ms. Lim.

#### History of Intimidation of Women of Color

Sheriff Villanueva referred to Supervisor Hilda Solis as "La Malinche" in his Facebook Live session. La Malinche is commonly known as a traitor. He did not explain why he called her by his name. At the time, Supervisor Solis took up a BOS motion and he was on a rant about how the Supervisor was full of it. He commented that he would expect support from the one Latina on the BOS, but Supervisor Solis did not support him.

Sheriff Villanueva also made derogatory comments about Supervisor Kuehl. He also commented about Patty Giggins to the COC Commission. He accused her of collusion or the inappropriate granting of funds. He referred to her as corrupt several times.

Similarly, he suggested that Supervisor Holly Mitchell was corrupt and improperly benefited from some decisions she made.

Max Huntsman

Sheriff Villanueva commented about Max Huntsman, Inspector General, nonstop. Sheriff Villanueva called him "Gustav Huntsman," alluding that he was a child of a Nazi. Sheriff Villanueva has made his comments about Huntsman in writing. Ms. Pawlowski believes Sheriff Villanueva referenced it in a letter. He does not hide it. Sheriff Villanueva referred to Mr. Huntsman and said his real name was "Gustav." Ms. Pawlowski believed Sheriff Villanueva's comments were intended to be about Mr. Huntsman's national origin.

KFI Radio Talk Show

Sheriff Villanueva also commented about justice deputies on radio station KFI. Ms. Pawlowski said everything blended together. She listened to his comments in the different forums giving him space. She could not distinguish one from the other. They listened to all of his comments across various media platforms. Ms. Pawlowski believed some of it was captured and could be located by Lenny McGuire.


# **INTERVIEW TRANSCRIPTS AND AUDIOS**

**CONFIDENTIAL**

**COLA002147**

EXHIBIT 25 - Page 484





**IV 2558101  
AUDIOS AND  
TRANSCRIPTS**

# COMPLAINANT INTERVIEW

CONFIDENTIAL

COLA002149

EXHIBIT 25 - Page 486



**REFER TO INTERVIEW TRANSCRIPTS AND AUDIO CD**

**1. COMPLAINANT ESTHER LIM**

**CONFIDENTIAL**

**COLA002150**

EXHIBIT 25 - Page 487

**IV 2558101**

**WITNESS INTERVIEW**

**JUSTICE DEPUTY ESTHER LIM**

**Herrera:** So my name is Christine Diaz Herrera. I am an attorney with the Law Firm of Sanders Roberts. I have been hired by the county to be an independent investigator. So I'm here in that capacity. I'm a neutral third party and a factfinder. While I don't make any kind of determinations regarding discipline or anything of that manner, I will, you know, certainly conduct interviews and engage in factfinding, regarding the allegations that you've submitted. Let's see here. As a county employee there's an expectation that you'll be honest and truthful, not withhold any relevant information and cooperate with the investigation. This is confidential and so that means that what you tell me I'm not going to be sharing with every single person that I talk to, you know, in subsequent interviews. We do ask that you keep the substance of our interview confidential. Now certainly the fact that you spoke to me or that the investigation exists, does not have to be confidential and I leave that to your discretion of, you know, who'd you want to share that with, but we do ask that the questions themselves remain confidential. Also the.. both, you know, at a county, state and federal level, retaliation is not tolerated so we- if you feel like you've been a victim of retaliation in any way for your participation here today, that's something I would want you to let me know immediately so that I could have that addressed. Likewise we ask that you don't retaliate against anyone participating in this investigation. All allegations of retaliation are, taken very seriously. Today is July 28<sup>th</sup> 2022. It is 1:17 PM and, could you say your name for the record?

**Lim:** Esther Lim.

**Herrera:** Perfect. I don't know if you have any questions for me before we get started.

**Lim:** So after this process, what's next? I'm just kinda curious about next steps.

**Herrera:** So then I- once I complete this investigation, I would, draft a report and then that report would be given to County Counsel. And then my understanding is is from there they have their own process for assessing, you know, whether discipline's appropriate or, you know, all

**IAB IV 2558101**

**Page 1 of 22**

**ESTHER LIM**

of that. I don't actually have any role in that part. So the next steps would be me completing the investigation and submitting my report.

**Lim:** M-hm. And then kinda prior to- 'cause I was looking things over. My complaint was filed in March, and so I'm just kinda curious what was done between March and, like, now. So in the last kind of, like, four months.

**Herrera:** Yeah, I don't have any kind of information about what their process was or what they had done. I do know that there is an intake process where they've gathered information and I believe, you know, you've been interviewed for that intake process. And then I think, at that point it gets- I'm sure that there's some type of internal process and then they decide whether or not it's, you know, appropriate to go to an external investigator to stay, you know, within the county process and in this case obviously, it's been, you know, sent to an external investigator, which is me. So I don't know what has happened all in those months. I do know that we were recently given this investigation and so we're, you know, now acting on that and I think you have every reason to expect that it'll be handled judici- you know, what's the word.. timely. And, you know, it's certainly our interest to get it, you know, to be as thorough and comprehensive as possible but also as timely as possible as well.

**Lim:** From the previous kind of, you know, process, was any of the materials provided to you in terms of, like, what they've done or, you know, the intake materials or anything like that?

**Herrera:** I do have the intake materials. And I do have, you know, I believe the interview itself, like the intake interview, I do have the notes from that. So. But, you know, we will be covering a lot of the same ground in the sense that things that you've told them I'm going to ask you about. So there will be some repeat obviously.

**Lim:** Okay. And do you have a sense in terms of, what's been done with the person that I've complained to- or complained about? What I'm complaining about?

**Herrera:** I'm sorry, I don't know--

**Lim:** 'Cause my complaint is against the sheriff and so do we know in terms of, like, the process, like, what's been done, like, with him? Like, has he been interviewed? Is he also, you know, part of this process as well?

**Herrera:** Those are not questions that I would be able to answer for you 'cause obviously that's a separate, you know, when someone's a subject. I mean certainly what I can tell you is that when someone is a subject of, you know, an investigation of this nature, they are notified. So I am aware that he, you know, certainly he would've been notified that there's an investigation, although the details would not've been, you know, would not've been provided to him. But certainly there's notification 'cause that's the county's process. But other than that, I wouldn't be able to share any further information.

**Lim:** Okay. Sounds good.

**Herrera:** Let's see, so background. I usually start with a little bit of background. How long have you worked for the county?

**Lim:** Since June of 2020.

**Herrera:** And, which department or who did you start working with?

**Lim:** So I work for the Board of Supervisors, specifically for Supervisor Hilda Solis, who is supervisor of the first district, and I serve as her justice deputy.

**Herrera:** So were you hired in as her justice deputy?

**Lim:** [inaudible]

**Herrera:** And, what are your duties?

**Lim:** So I handle her public safety and justice portfolio; I oversee the Public Safety Department including, you know, the Sheriff's Department, Probation, APB, PD, DA; I assist in, you know, drafting motions, statements, remarks, related to public safety, specifically the supervisors, you know, agenda on public safety; I, you know, serve as the liaison for the supervisor with the various public safety departments including the oversight entities; I engage with community members on this; I go and visit and monitor the jails and the juvenile correctional facilities.

**Herrera:** And, what type of monitoring- like, how do you monitor them?

**Lim:** So going into the actual facilities, into the jails, into the halls and camps and, you know, talking with folks who are in there, you know. Just observing what I'm seeing and, you know, and reporting it to either-reporting it both to oversight entities and also to, to my boss.

**Herrera:** And what oversight entities do you interact with?

**Lim:** The Probation Oversight Commission, the Office of Inspector General, the Sheriff Civilian Oversight Commission, Sybil Brand Commission.

**Herrera:** I'm sorry, what was the last one you said?

**Lim:** Sybil Brand.

**Herrera:** Okay. And you said the Sheriff Oversight--

**Lim:** Sheriff Civilian Oversight Commission.

**Herrera:** Sorry I was not hired for my typing abilities so, I try my best. Luckily this is recorded so I guess if I needed to I could go back, but- I generally like to make sure I understand before I move on. And so.. and who do you report to?

**Lim:** To my Chief of Staff Cindy Chen and then also to the supervisor, Hilda Solis.

**Herrera:** Okay. And, prior to doing this work, what had you been- what type of work were you performing prior to this position as the justice deputy?

**Lim:** So I was at the ACLU of Southern California for almost a decade.

**Herrera:** And what type of work did you focus on while you were at the ACLU?

**Lim:** Law enforcement accountability and jail conditions.

**Herrera:** So was there any overlap in terms of, like, that there were groups that you had already been interacting with and then that continued in your new role as justice deputy?

**Lim:** M-hm. So while I was at the ACLU I did interact with the sheriff's department, with, you know, with the board of supervisors, you know, with oversight entities, specifically the OIG and the Sheriff Civilian Oversight Commission and that continued obviously in this role.

**Herrera:** So, for the basis of your complaint, my understanding is that there was a statement, a July 28<sup>th</sup> statement, in 2021 by the sheriff in his Facebook Live?

**Lim:** Yeah, there are at least four.. four incidents. I'm sure there are others. I just have not reviewed every single one of his Facebook Lives.

**Herrera:** Okay. So can you walk me through the four different incidences?

**Lim:** Yeah, so one was on July 28<sup>th</sup> 2021, interestingly exactly a year ago. So the sheriff, while he was in uniform, he frequently goes on Facebook Live and this time he did and he talked about one of the motions that I had drafted on behalf of the supervisor; made comments, you know, to his audience, you know, the live audience and also audience members who, you know, look at his Facebook Live after, and I think his quote was 'I don't think the public realizes when the Board of Supervisors write these motions these are written by their justice deputies, who are some 20-something woke individuals who are basically putting in words what doesn't pass legal muster at all.'

**Herrera:** And, what was the specific motion he was referencing that day?

**Lim:** So this one was related to a motion that the supervisor put forward the day before on July 27<sup>th</sup>, and this one was called 'Taking Action For The Protection For Surviving Families From Law Enforcement Harassment and Retaliation'. And in the video, he was holding and reading from, from the motion.

**Herrera:** And so, it was, the motion that he was reading was drafted by you?

**Lim:** M-hm.

**Herrera:** Okay. And was there anyone else that had also participated in drafting the motion?

**Lim:** No.

**Herrera:** Did you have any knowledge of whether he, had awareness that it was you specifically?

**Lim:** The motions have, not only the supervisor's initial but the initials of the deputies who drafted it. So my initials are on there. And he does know who I am.

**Herrera:** And how do you know that?

**Lim:** So when I was at the ACLU, we had a working relationship then, and in.. I'm gonna say, I think it was February of 2021, he had written a letter to- addressed to Supervisor Solis, cc'd all the board of

IAB IV 2558101

Page 5 of 22

ESTHER LIM

supervisors, the CEO - this is also kind of part of the, you know, the harassment - and had, with no justification, opened up a, I guess an investigation into my social media accounts, in his attempt to get me fired. And the OIG and I believe the COC but definitely the OIG has actually requested information from the sheriff's department and the sheriff in terms of why they thought it was appropriate to, open up an investigation into my social media accounts, which they have yet to this day have not provided any sort of documentation or justification to them.

**Herrera:** Okay. And, had you been, you personally, had you been critical of the sheriff in the past?

**Lim:** Yes 'cause that's part of the accountability that the board of supervisors does. We are critical of the sheriff's department and the sheriff when they engage in misconduct and are not transparent and are not being held accountable or refuse to be held accountable, and does not, you know, when he doesn't collaborate and cooperate with oversight entities, then yes, we are critical.

**Herrera:** And, in what way would he have been aware of- I mean.. So when he hasn't cooperated, like let's say, for example, with the Oversight Commission, is it something that your office addresses? Like, how is that addressed by your office if he's not, for example, cooperating.

**Lim:** Yes. So hier-, like in hierarchy-wise, you know, the board of supervisors, right? is the governance over all of the county departments and that does include the sheriff's department including all the department heads. Even though the sheriff is an elected official, he's still, right?, like there's still supervisory authority that the board of supervisors has. My boss is one of five, and so, you know, we as a justice deputy, as a representative of the supervisor, right, like that's part of the hierarchy and how we hold them accountable. And why we would hold them accountable.

**Herrera:** Well I think what I was asking is more specific in the sense that, like, I'm just trying to take something piece by piece. So for example, if he didn't cooperate or, you know, maybe attend a Commission meeting, an Oversight Commission meeting, what if any response does your office give? Like is there a letter that they send, like 'Hey you should've attended' or is it brought up in a board meeting? I guess that's what I'm asking is, what kind of response is there if- something like that.

**Lim:** Something is brought up in a board meeting through motions and we also have the oversight entities or also a representative of the

supervisor, and so that's why the supervisor has oversight entities, so that when the sheriff's department isn't complying or is engaging in misconduct, these oversight entities will, you know, do what they need to do and sometimes that takes the form of, you know, issuing subpoenas to, you know, force the sheriff or his representatives to attend and, you know, talk about whatever, you know, incidents that they engaged in. Other forms, you know, the way that the supervisors will, you know, hold the sheriff's department and the sheriff accountable is through motions, and in this particular one, we were hearing from constituents that they were being harassed by deputies in the sheriff's department, whose loved ones were, you know, shot and killed and these deputies are harassing them and so, you know, given that we kept hearing this, the supervisor decided to do a motion. And she's done, you know, actually many motions, related to sheriff accountability, to basically highlight, you know, this issue that it is, you know, misconduct; it's harassment; it's retaliation. And that the sheriff's department should [inaudible]

**Herrera:** Okay. And I guess what I was asking too is, you know, is there anything - and I know this is kind of a broad question, but - is there anything that you would've done prior to him coming, you know, writing that letter on February 2021 - yeah, 2021 - that would've focused- that he would've known it was you, that it was your work, or. Was there anything in particular that, you know, that would've brought his attention to you, right? 'Cause you're one staff of, you know, a whole office. Like, is there any reason why he would've focused on you that you're aware of?

**Lim:** Because my role at the ACLU was also the same: being critical of the sheriff and the sheriff's department. So, you know, being the sheriff, he would've been part of that. I've done several motions related to, you know, sheriff accountability and so, you know, that would probably flag for him that.. you know, that I'm her justice deputy. You know, my information is on the website, seeing as I'm the supervisor's justice deputy.

**Herrera:** Okay. And had you been critical of him in your own personal social media?

**Lim:** Yes.

**Herrera:** And is your social media public?

**Lim:** It is.



**Herrera:** So he may have also been aware just based on your own social media postings?

**Lim:** Probably.

**Herrera:** Okay. And so, when he says, you know, 'these are 20-something woke individuals', are you yourself, are you in your 20s?

**Lim:** No I'm not.

**Herrera:** Do you have any reason to believe that he would even know your age or have any sense of how young you are?

**Lim:** No, and I think it's completely inappropriate 'cause he's- You know, these comments are incredibly disparaging. I mean, not just like being ageist, but also, you know, when he's saying that 'doesn't pass legal muster', right? Like trying to disparage our, like, educational and intellectual levels.

**Herrera:** Okay. And.. and how did you become aware of the, the Facebook Live meeting?

**Lim:** So sometimes our county coms, County Communications, will send us a transcript, of his Facebook Lives and I believe that's how I knew about this one. I typically don't, like, actively listen to his, his Facebook Lives or, you know, other justice deputies might've also heard the Communications deputy. So, yeah, so that's how we know about the--

**Herrera:** You don't have it in transcript?

**Lim:** I- I would have to go back, but again, all of his Facebook Lives are on the sheriff's department Facebook website. It's all there, in terms of, like, all the videos and everything else.

**Herrera:** So to your knowledge that Facebook Live is still available on his Facebook page?

**Lim:** Probably. I don't think he's deleting. And, you know, I mean, I'm providing, like, four examples, but again, I have not listened to every single one of his Facebook Lives, so there very well could be, like, more examples of him being, you know, disparaging to me and other justice deputies and other, you know, staff.

**Herrera:** Other than the letter that you referenced, from February 2021, has he ever specifically said your name or, like, raised an issue with you? Other than the February letter?

**Lim:** Yes. In a February '22 letter, he also did the same thing, saying why the supervisor, you know, had not, like, disciplined me. So there was another '22- 2022 letter that basically says the same thing. There was a community townhall meeting where, where obviously we recognize each other and during the, during the meeting, he turned to me in front of the audience and said - I do not remember the exact quote, but it was basically, you know, like 'Esther, go tell your boss that I wanna' like, you know, 'that I wanna debate her.'

**Herrera:** Okay. And what was this- when was the townhall meeting?

**Lim:** You know, I don't remember. It's not, it's not part of the four examples, but you know, you're question obviously, like, reminded me of, like, when he, you know, said my name. So that was one and obviously the two letters, the 2021 letter and the 2022 letter, was directly about, was directly about me, so.

**Herrera:** Was the- Do you believe the community townhall meeting, was it this year?

**Lim:** No. It was.. I'm going to say maybe it was last year.

**Herrera:** After the pandemic but.. that's how I almost see things now, like, you know, is it prior to 2020 or, you know.

**Lim:** Yeah. It was definitely last year. I can't even tell you, like, when last year but, yeah, I'm not sure.

**Herrera:** Okay. And, are you, are you often in meetings or in places where you're both and in his presence?

**Lim:** I mean because I'm her justice deputy and so whenever there is a public safety-related kind of meeting or community townhall, I do go. Our field deputies also go as well, so it's not like I go to all of them. If he is going to be there, I typically am.. assigned to go. So I would say in the, you know, almost two-and-a-half years that I've been, you know, in this position, I probably have seen the sheriff a handful of times.

**Herrera:** And does he attend board meetings?

**Lim:** So our board meetings are all virtual, but he has- Yeah, but he does- You know, he has attended virtually and provided, you know, public comments. Where he also, you know, makes disparaging comments about the justice deputies and also about the board of supervisors as well.

**Herrera:** So he has made disparaging comments that include you--

**Lim:** M-hm.

**Herrera:** --during those meetings as well.

**Lim:** Yeah, m-hm.

**Herrera:** And, and are those comments along the lines of these two about you being woke or whatnot?

**Lim:** Being woke, not passing legal muster. In fact, the comments that he made on the 28<sup>th</sup> I believe - again, I could be wrong, but - I believe that on the 27<sup>th</sup> when the motion was actually issued, that he provided public comments, and made these remarks.

**Herrera:** So he may have repeated the same remarks that- Okay.

**Lim:** M-hm.

**Herrera:** And, to your knowledge, where would I- is there a place where I could view it? Is it just online? The board--

**Lim:** Yeah, so the Board of Supervisors' agenda and there is a, a search function where you can look at, like, the transcripts.

**Herrera:** Okay. Got it. And so then kind of going next to July 28<sup>th</sup>, right, I believe there was.. No wait, that was the--

**Lim:** Yeah, so this is that one, yeah.

**Herrera:** --the one we already did. Okay, we already did that one. So then I think there's another one that's February 16<sup>th</sup> and, I believe it--

**Lim:** Well there was one- Yeah, there was actually one before that, so October 6<sup>th</sup> 2021 during another Facebook Live, the sheriff said, quote 'You hear me loud and clear now because if you're.. 'because if you're not watching their entire thing I'm pretty sure your flunkies are going to listen to the whole thing and report back to you.' And so he was making

that comment to the board of supervisors. Obviously the board of supervisors wasn't listening to his Facebook Live. '...and the flunkies at these' you know, pejoratively describing our- me and other justice deputies.

**Herrera:** Did he specifically reference the justice deputies or just all county staff or?

**Lim:** It would be the justice deputies because we're the ones that, you know, are the liaison to the sheriff's department, and so it would be the justice deputies because they work on the public safety portfolio. You know, we would be the ones reporting to our supervisors.

**Herrera:** Got it. And then, when was the next statement or thing?

**Lim:** Then the next one was on February 16<sup>th</sup>. So this one was actually something that another justice deputy had shared with me, that the sheriff was at a community townhall and the quote was 'All the supervisors have 25-year-old justice deputies who are right out of college and writing all their motions.' So that was, you know, another incident.

**Herrera:** And, did you find that offensive?

**Lim:** I did.

**Herrera:** And why did you find it offensive?

**Lim:** One, I think it's an ageist comment. You know, assuming our ages, and then, you know, saying that we're right out of college, trying to minimize again our education, our intellect, you know, and we're, you know, writing all their motions. I mean that's what, that's what policy deputies do. But, you know- It's not just the fact that he's just making these comments. I think, you know, the weight of his words as a sheriff of Los Angeles County, and then stating these state- making these statements in a very public platform, you know, with- potentially with people who, you know, could engage in, you know, possibly, you know, like.. violent, dangerous, who knows, to retaliate against us, I think, you know, just kind of poses some safety concerns. I also think it's being incredibly unprofessional.

**Herrera:** And.. have you, you know, after his comments, after the comments that he's made, have you ever witnessed an uptick in negative attention or commentary on your social media platform? Like, any of your social media accounts?

**Lim:** So I don't use my social media accounts anymore, but, you know, there are comments made, you know, under, like, the supervisor's social media accounts, 'cause she has social media accounts where they, you know, use disparaging kind of comments there. There was another Facebook Live where the supervisor was issuing a reward to assist a sheriff's department investigation, where I did provide remarks and some of the comments that were made under that Facebook Live comments, you know, there was comments about me under there.. yeah. I'm just, like, not tracking every single kind of one, right? But...

**Herrera:** I'm just wondering if you had noticed, 'cause obviously there could be an element of people that pay attention to him or, you know, like him that, you know, could be dangerous. So I'm wondering if you had seen any type of, like, any kind of threat to you or any kind of, like, negative comment to you based on, you know...

**Lim:** Yeah. I mean, the one that I recall is the comment that was made, when I was providing remarks on behalf of the supervisor for the reward.

**Herrera:** You made remarks on what day?

**Lim:** I'm going to have to find that for you.

**Herrera:** Okay. Maybe- and was it, it was on Facebook Live that you made the comments?

**Lim:** Said something? Yeah, it was on Facebook Live. The supervisor had issued a, I believe it was a 20,000 or 25,000 reward to assist in three homicide investigations. I provided remarks and then under the, you know, under the Facebook Live comments, there was something directly on me.

**Herrera:** Okay. 'Cause I think those are still saved too. If that Facebook Live still exists, I think I can still--

**Lim:** All the comments and everything, yep, are saved as well. And also, I'm kinda curious too on all these other Facebook Lives if comments were also made there and then. I just have not checked on those.

**Herrera:** Yeah and I'm certain that I will now go through, and check them myself. But, you know, anything, any help you can give me with respect to dates that I make sure that I see, you know, obviously I'd appreciate it. But I will certainly do my own review.

**Lim:** Of the two, right? the July 28<sup>th</sup> and the October 6<sup>th</sup>, are ones that I know of. But again, as I shared, he- you'll see that there are many many many Facebook Lives, and he does use a Facebook Live to be disparaging and, and just really negative and just, like, harassing and intimidating, you know, the supervisors and also, you know, the staff that work for, you know, work for her, work for the respective supervisors, specifically the justice deputies in general.

**Herrera:** And, you know, I didn't ask in the background but I should've. When did you get your undergrad degree? And in what? What school did you go to, what was your degree in and what year did you graduate?

**Lim:** Can I ask about these questions? Like, why, like what I did before and how it pertains to this?

**Herrera:** Just background information.

**Lim:** Okay. So.. I graduated in 2006 and then graduated grad school in 2010.

**Herrera:** Okay. And what school did you go to for undergrad?

**Lim:** Long Beach State, and USC.

**Herrera:** Okay. And, did you- were you awarded a BA at Long Beach State?

**Lim:** Yes.

**Herrera:** Okay. And what was the subject matter?

**Lim:** Criminal justice.

**Herrera:** Okay. And the, was it a master's at USC or a?

**Lim:** Masters in social work.

**Herrera:** And so then, I know one of the things that was in the intake was that, you reported that there's been a history of the sheriff trying to intimidate women of color and I wanted to know if you could expand on that a bit more and give me more information in terms of...

**Lim:** Yeah, so he's made comments about the supervisors. Right now we have an all-women board, so he's also made misogynistic comments about the board. You know, saying that he wanted to take all of the board of supervisors to a shed and beat them. He's made comments, a racist sexist slur against my boss, who is Latina. He called her La

Malinche. You know, he also made disparaging comments about another supervisor, Holly Mitchell, who is, who's a black woman; has intimidated and harassed our former CEO who was an Asian woman; harassed and intimidated members of the Sheriff's Civilian Oversight Commission, many of them women, including one of the chairs who is a black woman. I mean he just, you know.

**Herrera:** And when you say- Can you give me some where you said he harassed the former CEO who was an Asian woman. Do you have any more specific about what he did or said or?

**Lim:** Like, opened up a criminal investigation, like, on her in a way to intimidate her. Basically anyone who has the responsibility of overseeing the sheriff and the sheriff's department, he has either tried to open up these arbitrary, like, you know, no reason investigations, criminal or not, to, you know, silence folks. In my time as justice deputy, you know, like, on behalf of the supervisor I have, you know, drafted many motions around sheriff accountability because of the misconduct that he and his department engages in, and as a result he goes after Supervisor Solis and he also goes after me. Yeah.

**Herrera:** What did he say about- you said he made negative comments about.. Supervisor Holly Mitchell. Do you recall what he said?

**Lim:** I don't really recall, but, what he exactly says, but, you know, when he's saying that, you know, that we 'worship at the altar of wokeness' or we're 'engaging in an orgy of wokeness'. You know, comments like that. And again, you know, like the general comment about, like, that he wants to take the Board to the shed and beat them. Like, it's just, just completely inappropriate.

**Herrera:** And when he makes these comments is it typically during board meetings so that'd be something I would see in the minutes or something of that nature?

**Lim:** It'd be in the board minutes or it would be in his Facebook Lives. And honestly I cannot tell you which one, but he pretty much goes after the board probably in every single one of those Facebook Lives.

**Herrera:** I think- I know you had said that there was four things that you were going to tell me. So is there--

**Lim:** So the other one, which I kind of mentioned, right?, were the two letters that he wrote. One was in February of 2021 and then the other one was in, I think it was March of 2022.

**Herrera:** And in those letters, I think, was he saying that you were--

**Lim:** Oh you know what? Sorry, my bad. He- So yes, in addition to the 2022 letter, he also in a Facebook Live made.. during a Facebook Live I guess someone had a question about, like, why are there only women on the board and on staff? His quote was 'Good question.' They talk about inclusivity, no male justice deputy staff. 'The board should explain why they exclude men from their ranks. The people they hire are all 20-something fresh out of college, don't have a lot of senior people, woke flunkies straight out of college, first job. That's who writes the nonsense board letters.' And there is, you know, a male justice deputy and that, you know, is from the second district. So there's that. But again, you know, the comments around, like, you know, we're all, like, 20-something, we're fresh out of college, da-da-da-da-da, nonsense board orders...

**Herrera:** Okay and I think the July 27<sup>th</sup>, the comments were regarding your motion taking action, right? So there's that. And, so for that letter that he wrote about you in February of 2021 regarding, like, I believe it was your social media accounts, is that correct? Was there- Did he ever reference that? So, am I correct in assuming, did he bring this up in a board meeting or was this just a letter that he sent in or?

**Lim:** Yes. So he sent it in a letter. I believe he also shared it with KFI, the radio station AM 640. So it got coverage there and it just kind of ended there. But again, you know, it was unjustified in that the Office of the Inspector General also, you know, got involved in terms of requesting, you know, the justification and the reason why the sheriff, or the sheriff's department, would even.. investigate my personal social media accounts.

**Herrera:** And did you have any knowledge or any information given to you that, that the investigation went beyond just looking at your public social media accounts?

**Lim:** So, the OIG never got any sort of information from the sheriff's department as to the what, you know, the why, the what or anything like that. We just know that they went through my social media accounts, and then they used that to- or he used that to write the letter to my boss in an attempt to get me terminated. In 2021 and also in 2022.

**Herrera:** And, to your knowledge is there anything in county policy that would.. prevent you from making any of the commentary that you made in your social media?



**Lim:** I don't believe so. When the incident happened.. I think we had made- basically had made a joint decision that I just would not use my social media account. Not that there was, you know, a policy per se, but we just figured I just won't, like, use it. Because I do know that there are other justice deputies who've had, like, social media accounts.

**Herrera:** But that wasn't based on there being any type of policy. It's just you thought to avoid further--

**Lim:** To avoid further, like, you know, harassment from the sheriff.

**Herrera:** M-hm. And in any of those social media posts, did any of his supporters or followers try to harass you through any of those, like, old social media posts that are still up? Like, did anything that's in there, did you get any negative attention based on--

**Lim:** Yeah, I mean I have not been on it so I don't know, but I know, like, screenshots were taken.

**Herrera:** Uh-huh.

**Lim:** But I've had this social media account since, like, 2011, and, you know, we were encouraged to use our social media accounts, at my former job at the ACLU. So, it's our personal account and the bio, right? and the Twitter bio, it all says, right?, like these are our personal tweets, right, they're not a reflection of, you know, who we work for or where we work for, you know, that kind of thing. So that disclaimer is part of our bio.

**Herrera:** And to your knowledge, were the screenshots all, like, on a public page so nothing was, like.. protected or?

**Lim:** Yeah. So my account, my account's public, so it's not a private account.

**Herrera:** And this is a Twitter account, correct?

**Lim:** M-hm.

**Herrera:** Let me just make sure I've gone through.. Is there anything else, any other examples or any other.. like any other information that I should know that kind of, that evidence of, that support the allegation?

**Lim:** I mean, I have a part of my CPOE complaint. I did list, I believe it was three witnesses, you know, to the harassment. In many ways they were

also kind of victims of the harassment too. And, I don't know if that's, you know, if you're going to interview them as well as part of the investigation.

**Herrera:** [indiscernible]

**Lim:** Okay.

**Herrera:** Can you give me their names again? Just to make sure I have it.

**Lim:** Yeah. So it's Veronica Pawlowski, who is the justice deputy for the third district, and Kyla Coates, who is the justice deputy for the second district- sorry, the fourth district, and Inspector General Max Huntsman.

**Herrera:** Okay. Got it. And, to the notes that I have here, the- some of the comments were related to Ms. Coates directly, correct?

**Lim:** Yes. So the, the community townhall in February 2022, the community townhall happened in her district. And so, yeah, so she had heard about the comments made and shared them with me.

**Herrera:** And, did she tell you via email, via phone, or like, is there any kind of.. contemporaneous account of exactly what was said? Although I'm--

**Lim:** I think she might've either, emailed or, you know, told me about it.

**Herrera:** And did she share with you that she also felt offended by the comments that he had made?

**Lim:** Yes. So, you know, I don't think that they file their own CPOE complaints. You know, largely because they- typically people who do make complaints about the sheriff, they get, you know, harassed and intimidated. And so they kinda didn't want to go through that, but they were open to at least being witnesses for my complaint. But they have also been, you know, subjected to kind of the same, like, comments and impact.

**Herrera:** And Ms. Veronica Pawlowski, what did she witness?

**Lim:** So she has, you know, sort of listened to the Facebook Live, you know, during board meetings when he's making these comments. You know, we're all listening to it, so she I'm sure has listened to comments, you know, these comments being made.

**Herrera:** And has she communicated to you that she was also offended by the comments?

**Lim:** Yes. Oh I almost forgot. He also filed a CPOE complaint against me back in 2021. An investigation was done within a month, and basically the response to his CPOE complaint against me was that, the complaints don't present a potential violation because no protected characteristic was involved and the allegations did not sufficiently connect equity to the conduct.

**Herrera:** And, did you believe that he had filed that to harass you?

**Lim:** Yes. Again as his way of trying to get me fired.

**Herrera:** Is there any actions- any other direct actions that he's taken against you or, like, that he's taken either directly against you or indirectly? Like mentioning you? Is there anything else?

**Lim:** I'm not trying to be difficult. I just think it's hard because I don't listen to every single thing that he says. And he- you'll find, Christine, that, like, he frequently goes on Facebook Live and he frequently goes on, like, Twitter and his own social media accounts. He also had his own, like, radio show with AM 640, you know, so I'm sure he's, you know, making comments there. I just- you know, I have, right, like we have jobs; I have things to do; not just, like, listen to all of his stuff. Unfortunately you're going to have to do some of that, I'm sorry- But yeah, he- I know that he does do this. I just have not, right, like listened to every single one. But I am certain that it's more than the four kind of examples I have provided. These are kind of examples of the types of comments that he makes. And at least, you know, his two letters about me and his filing the CPOE complaint I believe are, like, the way that he wanted to get me fired, try to intimidate me and harass me. So there's at least, like, three examples of him doing that directly to me. The July 2021, I mean that was one example of him, you know, actually, like, showing the motion that I had drafted and connecting those comments, you know, to me. And then his kind of general comments about justice deputies, you know, made about me and my other colleagues.

**Herrera:** M-hm. And.. you know, I'm going to ask this because I think it's important for me to, you know, have both sides. His comments in his letter to you, I believe he's saying that, you know, they're vulgar and bullying. So he is accusing you of being vulgar and bullying and using profanity and all of that. Do you have any response to that kind of, you know- 'Cause I have seen the tweets and some of them, you know, do use profanity and are directed at him. So do you think there's any merit

to what he's saying in terms of just the language itself was.. profane and not--

**Lim:** The language that's used does use profanity.

**Herrera:** Yeah.

**Lim:** You know, and so whether that's vulgar I think is subjective. But in terms of the comments and the stuff that he's doing using his platform and who he is and who he represents and the power and influence that he has, and his, I would say, documented history of harassing, intimidating other, you know, people who, you know, oversee him, I think is dangerous. I can't open up a criminal investigation on him whereas, you know, he is using county resources and his influence and power to open up an investigation against me with no justification even when the inspector general requests that information. There's documented history of him opening up criminal investigations against members of the Sheriff Civilian Oversight Commission, who've been, you know, appointed to oversee him. So this is more than just like a complaint against Alex Villanueva; it's a complaint against, you know, as I stated earlier, this is the sheriff of LA County, the largest sheriff's department, you know, in the country, with, you know, access to resources that I, you know, don't have. I don't have the platform that he does, to, you know, possibly incite, you know, people to engage in, you know, possible, you know, who knows what, that endangers not only, you know, my safety and the safety of others.

**Herrera:** Fair point. I just figured I, you know, since I have you here it's important to ask, you know. 'Cause he is essentially saying that you're- he's saying that you're bullying him, the sheriff of Los Angeles, so, you know, I'm just curious the response. And I think that's a- I think I understand what you're saying here. And I think that's all the questions I have. It may be necessary, 'cause what I'm going to do obviously as part of the investigation is I'm going to have to listen to a lot of the Facebook Lives to make sure that I've kind of captured anything that could've touched on you and that's a reference to you. So I may have to, come back to you. I don't always have to come back in terms of once I've conducted, you know, the introductory interview, but I may have to come back to you if I find that there's a lot more that he's referenced just to ask you about it and to see, you know, if, you know.

**Lim:** Totally. I'm very curious about what he said. Do you have, do you have the- I'm not sure as part of the materials that you have, along with my CPOE complaint I had also submitted a letter and the letter does have, like, at least a URLs, the links to at least the--

**Herrera:** I don't believe I have that, no.

**Lim:** Okay.

**Herrera:** So if you could send that to me. I can also ask my contact to send it to me as well 'cause it sounds like...

**Lim:** Yeah 'cause that one at least does hyperlink to the three: the July 2021, the.. October one and I believe the March Facebook Lives. But also--

**Herrera:** If you can send that to me, I would appreciate it, but I will also reach out to my contact to make sure that if there's anything- 'cause I do believe I am missing that. I have what- I think they call it the, the Policy of Equity report, like a notification form, and so that has a lot of, you know, the information, the pertinent information and then I have the actual intake form. Or, I guess I forget what the term is for this, but it essentially is- I think it's, like, seven, eight- it's several pages long. It's the Intake Assessment Form and so it has a lot of reference, you know, all the information in there, but I don't have the letter. So if there is a letter, I would appreciate having it.

**Lim:** I mean, the other thing too is, the sheriff's department - again, this is the other thing too, is, these are, you know, things that he's doing on a, like, a county- he's using a county account. This isn't his personal Alex Villanueva's Facebook. This is a sheriff's department Facebook site. But if you go on there, right? Like, the videos are arranged chronologically. So, since you have the dates, you would at least be able to see, like, the examples that I shared. But again, right, like I'm sure, at least Facebook Lives are fairly long.

**Herrera:** Now I'm curious, is there any- I don't know if you are, if you have motions at every board of supervisors meeting or if there's only- I mean, I wonder, is there a general, like, listing of the motions that would've come from you or from the justice deputy so that I could maybe cross-reference between the dates of memos and then the dates of, you know, the board of supervisors meetings or Facebook Lives? You know, if there's, like, maybe some particularly.. I don't know. I don't know if everything you do is controversial - it might be - but I'm wondering if there's any way to conference.

**Lim:** Yeah, it's not controversial to us because, one, it's the board doing it and it's the board that supports these motions, right? It's controversial to him because it's about holding him accountable.

**Herrera:** But that's what I'm saying. I don't know if there's any of that where, like, maybe particularly more of interest to him because maybe they were calling him out more directly. Like, for example, you know, I was reading about his- the commission and him not showing up and the subpoena and all of that. So, you know, I'm assuming that there might've been discussion about that in a board meeting or maybe even a motion about that. So that's what I'm saying. Like, if there's any way to, like, have a- if there's anywhere to look to see a better sense of, like, dates where I might have more fertile ground to look at? 'Cause he might be annoyed.

**Lim:** I could definitely- yeah, I can look at the ones that I have done, typically.. and I'll see when we filed the motions that are, like, sheriff related. I can send that over to you and then we can check to see--

**Herrera:** I would love that.

**Lim:** Yeah, and you can check to see if there was a, you know, a Facebook Live, you know, by him.

**Herrera:** Right. 'Cause I would imagine he might get irritated, you know, if you're doing something that's regarding accountability or kind of his lack of doing something. So I would imagine that might be more fertile ground, you know, those dates versus other dates.

**Lim:** Uh-huh, yeah.

**Herrera:** But anything you could give me, I'd greatly- I will gladly take it and then, you know, as I said, you know, I'm going to be very comprehensive in terms of talking to people and making sure that I have all the information that I need.

**Lim:** Great. Can I ask if part of your investigation was also going to be, like, talking to the sheriff?

**Herrera:** Yes.

**Lim:** Okay.

**Herrera:** Since he's the subject, yes. It will include talking to the sheriff. So, I guarantee you any social media I have is locked. (laughs) Not that there's anything in there, but, you know, I can't imagine having--

**Lim:** [indiscernible] yeah, you've seen it, yeah.

**Herrera:** Seeing what I saw in yours, when I, you know, I did the whole Google search. But, when I saw all yours, I was like, Oh okay.

**Lim:** It's more than beyond, you know, mine. It's other people who [indiscernible] he's harassing and intimidating.

**Herrera:** Correct.

**Lim:** People who are going to do any sort of investigation on him typically tends to be the subject of something.

**Herrera:** Yeah, that's, that's a fair point. And I certainly already have seen some of that. So that's why I'm saying.. I'm aware.

**Lim:** Yeah, okay. As long as you're aware, okay. Yeah, so I will look and take a look at the motions that we've issued.

**Herrera:** Although I'm sure he'd be bored with seeing a bunch of kid pictures, so, you know. Not that exciting. In any event, thank you so much for your time. I really do appreciate it, and I'm sure I'll be in touch because I probably will have to follow up once I've done a more comprehensive look-through.

**Lim:** Right. Thank you so much.

**Herrera:** Thank you so much. Have a good rest of your day.

**Lim:** You too. Bye.

**Herrera:** Take care.

LIM, ESTHER  
WPU  
plw

(IAB) IV 2558101

IAB IV 2558101

Page 22 of 22

ESTHER LIM

# EXHIBITS

CONFIDENTIAL

COLA002173

EXHIBIT 25 - Page 510



# EXHIBIT A

CONFIDENTIAL

COLA002174

EXHIBIT 25 - Page 511

For CISU Use:
(Method of Receipt)
<input type="checkbox"/> Telephone
<input type="checkbox"/> In-Person
<input checked="" type="checkbox"/> Online
<input type="checkbox"/> Paper Complaint
Reference
#2019-0016591
#2022-112209

## COUNTY POLICY OF EQUITY

### REPORT/NOTIFICATION FORM

#### Methods of Reporting Potential County Policy of Equity (CPOE) Violations:

- 1) You may use this form to report a potential violation of the CPOE;
- 2) File an online complaint at <https://ceop.bos.lacounty.gov> (strongly encouraged);
- 3) Call the County Intake Specialist Unit (CISU) at (855) 999-CEOP (2367); or
- 4) Visit the CISU office at the Kenneth Hahn Hall of Administration building located at 500 West Temple Street, Suite B-26, Los Angeles, CA 90012.

---

#### 1. Do you wish to file this complaint anonymously?

No

#### 2. Are you filing this complaint for:

Yourself

---

**(Note to Supervisors/Managers:** As a County Manager/Supervisor, it is the County's expectation that the CPOE complaint notification be submitted online at <https://ceop.lacounty.gov>).

#### Section A: Reporting Party Information

Today's Date: 3/8/2022

Name: Esther Lim

Emp. #: e662896

Title: Justice Deputy

Email: elim@bos.lacounty.gov

Work #: (213) 458-1795

Mobile #: [REDACTED]

Work Hrs.:

RDO:

Reporting Party's Department: BOARD OF SUPERVISORS

Dept. Head: Celia Zavala

Reporting Party's Other Department:

**Reporting Party's Unit of Assignment:** Board of Supervisors, Hilda L. Solis

**Reporting Party's Work Address:** 500 West Temple Street Los Angeles, CA 90012

**Reporting Party's Immediate Supervisor:** Cindy Chen

**Date & Time Form Completed:** 2022-03-08 21:28:13

**Did the complainant notify a supervisor/manager of this complaint prior to now?**

Yes

**Name of Supervisor/Manager Notified:** Cindy Chen

**Date:** 2022-03-08 15:32:00

**How:** Email

---

**Section B: Complainant(s) Information**

1.

**Name:** Esther Lim

**Emp. #:** e662896

**Title:** Justice Deputy

**Work #:** 2134581795

**Mobile #:** [REDACTED]

**Work Hrs.:**

**RDO:**

**Complainant's Department:** BOARD OF SUPERVISORS **Dept. Head:**

**Complainant's Other Department:**

**Complainant's Unit of Assignment:** Board of Supervisors, Hilda L. Solis

**Complainant's Work Address:**

**Complainant's Immediate Supervisor:** Cindy Chen

**Section C: Alleged Involved Party(ies) Information**

**1.**

**Name:** Alex Villanueva

**Emp. #:**

**Title:** Sheriff

**Work #:**

**Mobile #:**

**Work Hrs.:**

**RDO:**

**Involved Party's Department:** SHERIFF

**Dept. Head:**

**Involved Party's Other Department:**

**Involved Party's Unit of Assignment:** LA Sheriff's Department

**Involved Party's Work Address:**

**Involved Party's Immediate Supervisor:** Alex Villanueva

**Section D: Alleged Witness(es) Information (if they can be identified)**

1.

**Name:** Veronica Pawlowski**Emp. #:** e552095**Title:** Senior Justice Deputy**Work #:****Mobile #:** [REDACTED]**Work Hrs.:****RDO:****Witness's Department:** BOARD OF SUPERVISORS**Dept. Head:****Witness's Other Department:****Witness's Unit of Assignment:** Supervisor Sheila Kuehl**Witness's Work Address:****Witness's Immediate Supervisor:** Lisa Mandel

2.

**Name:** Kyla Coates**Emp. #:** e56300**Title:** Justice and Health Deputy**Work #:****Mobile #:** [REDACTED]**Work Hrs.:****RDO:****Witness's Department:** BOARD OF SUPERVISORS**Dept. Head:****Witness's Other Department:****Witness's Unit of Assignment:** Supervisor Janice Hahn**Witness's Work Address:****Witness's Immediate Supervisor:** Gerardo Pinedo

3.

**Name:** Max Huntsman**Emp. #:** e410745**Title:** Inspector General**Work #:****Mobile #:** [REDACTED]**Work Hrs.:****RDO:****Witness's Department:** OTHER**Dept. Head:****Witness's Other Department:** Office of Inspector General**Witness's Unit of Assignment:** Office of Inspector General**Witness's Work Address:****Witness's Immediate Supervisor:**

**Section E: Nature of Complaint or Issue(s)**

**1. What is the date of the alleged potential violation(s)?:** 07/28/2021

**2. Please provide a detailed summary of the alleged potential violation(s):**

I have four examples. Please see attached letter for additional information.

On July 28, 2021, Sheriff Villanueva, while in uniform, went on Facebook Live and said, "I don't think the public realizes, when [the Board of Supervisors] write these motions, these are written by their Justice Deputies, who are some 20-something, woke individuals, who are basically putting in words what doesn't pass legal muster at all."

On October 6, 2021, during a Facebook Live, Sheriff Villanueva said, "You hear me loud and clear now because if you're not watching their entire thing, I'm pretty sure your flunkies are going to listen to the whole thing and report back to you." When he uses the term "flunkies" he is pejoratively describing me to malign me and minimize my job as Justice Deputy.

On February 16, 2022, Sheriff Villanueva during a community town hall for the South Bay cities, said that "All the Supervisors have 25-year-old justice deputies who are right out of college and writing all their motions." This comment was made in front of the public and County staff. This is another example of Sheriff Villanueva discriminating against me based on age.

Fourth incident is on 3/22/22

**3. Why does the Complainant(s) believe the treatment occurred/is occurring?:**

Though the comments are made generally about the Justice Deputies, the attack was specifically lodged against me because Sheriff Villanueva is seen in the Facebook Live, holding a hard copy of the motion Supervisor Solis put forward on July 27, 2021 titled, "Taking Action: Further Protections for Surviving Families from Law Enforcement Harassment and Retaliation." The motion he was holding and reading from is one I worked on behalf of Supervisor Solis.

Given Sheriff Villanueva's documented history of intimidation and harassment of women and women of color, as the first, second generation Korean American woman to serve as Justice Deputy and the only Asian Justice Deputy, currently on staff, I believe Sheriff Villanueva is unfairly targeting me, as shown in the July 28, 2021 example.

I am also aware he has targeted, intimidated, and harassed another Asian woman and LA County employee, former Chief Executive Officer, Sachi Hamai.

Additionally, it behooves me that as an Asian woman I need to speak up during a time in which anti-Asian hate is at its all-time peak, due to ignorant, racist, and hateful comments about the cause of the COVID-19 pandemic that has led...

---

**Section F: TO BE COMPLETED BY SUPERVISORS/MANAGERS ONLY**

**Date supervisor/manager observed and/or was notified of the alleged potential violation(s):**

How was supervisor/manager made aware of the alleged potential violation(s)? (Explain in detail):

What action(s), if any, did the supervisor/manager take? (Explain in detail):

Did the supervisor/manager ascertain whether Complainant(s) is/are in need of any of the following?

Medical Attention:

Protection:

Separation from Alleged Involved Party(ies):

Other Assistance:

---

Did the supervisor/manager advise the Complainant(s) that they:

May seek confidential counseling or assistance from the County's Employee Assistance Program (EAP) at (213) 738-4200:

May contact the County Intake Specialist Unit (CISU) directly at (855)-999-2367, or via email at ceop@bos.lacounty.gov:

**OPTIONAL:** Please provide the information below for statistical purposes only

**Race/Ethnicity:** Asian (Not Hispanic or Latino)

"The employer is subject to certain governmental recordkeeping and reporting requirements for the administration of civil rights laws and regulations. In order to comply with these laws, the employer invites employees to voluntarily self-identify their race or ethnicity. Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment. The information obtained will be kept confidential and may only be used in accordance with the provisions of applicable laws, executive orders, and regulations, including those that require the information to be summarized and reported to the federal government for civil rights enforcement. When reported, data will not identify any specific individual." - (eeoc.gov)

**Sex:** Female

**Date Of Birth:** 1981-07-30

# EXHIBIT B

CONFIDENTIAL

COLA002181

EXHIBIT 25 - Page 518



**For I.S.U. Use Only**  
**Method of Receipt**  
☐ Telephone  
☐ In Person  
☐ POE Report Form  
☒ Other: CPOE  
**Intake #** 22-046

## Policy of Equality Report / Notification Form

**General Instructions:** Use this form to report a potential violation of the Policy of Equality. Non-supervisors may also report a potential violation of the Policy of Equality by calling the Intake Specialist Unit at (323) 890-5371 or visiting them at 4900 S. Eastern Avenue, Suite 203, Commerce.

Section A: Reporting Party Information

Today's Date: 03 / 17 / 2022

Name: Esther Lim Emp. #. 662896 Rank/Title Justice Deputy

Work Tel# 213-458-1795 ; Home Tel# [REDACTED] ; Work Hours - RDO

Unit of Assignment: Board Of Supervisors Office Unit Commander: Supervisor Hilda Solis

Division LA County Board of Supervisors

Name of Supervisor Completing this form (if different from above): \_\_\_\_\_ # \_\_\_\_\_

Date & Time form completed:                      /                      /                      hours.

☐ Anonymous (Do not provide identifying information above if anonymous. You must, however, fill out the rest of the form. **Do not check if you are a reporting supervisor.**)

Did the complainant and/or alleged victim notify a supervisor of this complaint prior to now?

☐ Yes (if yes, fill in details)

Who: \_\_\_\_\_

When: Date:        /        /        Time:        hours.

## How



No

☒

Do not know

Section B: Date And Time of Potential Violation

Day, Date and time alleged violation / alleged incident occurred: \_\_\_\_ / \_\_\_\_ / \_\_\_\_ , \_\_\_\_ hours or  
between \_\_\_\_ / \_\_\_\_ / \_\_\_\_ and \_\_\_\_ / \_\_\_\_ / \_\_\_\_

If multiple incidents or unknown, explain:  
See narrative.

Section C: Alleged Complainant(s) (if not the same as the Reporting Party and if they can be identified)

Same as RP Employee # \_\_\_\_\_ Rank/Title \_\_\_\_\_ UOA \_\_\_\_\_

Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_

Employee # \_\_\_\_\_ Rank/Title \_\_\_\_\_ UOA \_\_\_\_\_

Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_

Employee # \_\_\_\_\_ Rank/Title \_\_\_\_\_ UOA \_\_\_\_\_

Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_

\*\*\*\*\*

Section D: Alleged Involved Party(ies) (if they can be identified)

Villanueva, Alejandro (Sheriff) Employee # 246296 UOA LASD  
\_\_\_\_\_  
Employee # \_\_\_\_\_ UOA \_\_\_\_\_  
\_\_\_\_\_  
Employee # \_\_\_\_\_ UOA \_\_\_\_\_  
\_\_\_\_\_  
Employee # \_\_\_\_\_ UOA \_\_\_\_\_

\*\*\*\*\*

Section E: Alleged Witness(es) (if they can be identified)

Pawlowski, Veronica Employee # 552095 Rank/Title Senior Justice Deputy UOA BOS  
Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_  
Coates, Kyla Employee # 656300 Rank/Title Justice/Health Deputy UOA BOS  
Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_  
Huntsman, Max Employee # 410745 Rank/Title Inspector General UOA OIG  
Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_  
\_\_\_\_\_  
Employee # \_\_\_\_\_ Rank/Title \_\_\_\_\_ UOA \_\_\_\_\_  
Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_

\*\*\*\*\*

Section F: Nature of the Complaint or Issue(s) -- Be as detailed as possible, include all incidents & evidence.

On March 16, 2022, the ISU received a County Policy of Equity Report (ICMS #2022-112209) from CEOP Executive Director Vickey Bane, filed by RP/CP Justice Deputy Esther Lim, #662896. The Complainant, Justice Deputy Lim, Board of Supervisors employee, alleged the following, in pertinent part, (verbatim): "On July 28, 2021, Sheriff Villanueva, while in uniform, went on Facebook Live and said, "I don't think the public realizes, when [the Board of Supervisors] write these motions, these are written by their Justice Deputies, who are some 20-something, woke individuals, who are basically putting in words what doesn't pass legal muster at all."

"On February 16, 2022, Sheriff Villanueva during a community town hall for the South Bay cities, said that 'All the Supervisors

Ask: "Why do you believe this treatment is occurring?"

(☒ Check, if narrative is continued onto the next page)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Section F (cont'd): Nature of the Complaint or Issue(s) -- Be as detailed as possible, include all incidents & evidence.

(Continued)

have 25-year-old justice deputies who are right out of college and writing all their motions.' This comment was made in front of the public and County staff. This is another example of Sheriff Villanueva discriminating against me based on age."

In addition, Complainant Lim, wrote in pertinent part, "Given Sheriff Villanueva's documented history of intimidation and harassment of women and women of color, as the first, second generation Korean American woman to serve as Justice Deputy and the only Asian Justice Deputy, currently on staff, I believe Sheriff Villanueva is unfairly targeting me, as shown in the July 28, 2021 example.

I am also aware he has targeted, intimidated, and harassed another Asian woman and LA County employee, former Chief Executive Officer, Sachi Hamai."

(ISU Note: A copy of the CPOE complaint is contained in the ISU efile for details.)

\*\*\*\*\*

Note: Continue onto the next page

**Section G:** Supervisor -- FOR NON-VICTIM SUPERVISORY USE ONLY. DO NOT FILL OUT THIS SECTION IF YOU ARE THE ALLEGED VICTIM OR A NON-SUPERVISOR.

Date & Time notified of potential violation / observation was made: 03 / 16 / 2022 , 1521 hours.

How did you become aware of the potential violation (explain in detail):

On March 16, 2022, the ISU received CPOE ICMS #2022-112209, containing the above allegations.

Supervisor's Actions (if any) (explain in detail)

A POE Report was generated by ISU Deputy Xochilt Rosas to document the allegations in the County Policy of Equity Complaint.

Did you ascertain whether complainant(s) and/or victim(s) are in need of:

☒ Medical Attention

**Response:** to be ascertained

☒ Protection

**Response:** to be ascertained

☒ Other Assistance

**Response:** to be ascertained

Advised the complainant(s) and/or victim(s) that they:

☒ May seek confidential counseling or assistance from Employee Support Services

Notifications:

☐ **Intake Specialist Unit phone notification:** (During business hours, direct telephone (323) 890-5371. After hours, request through Sheriff's Headquarter's Bureau (323) 526-5541)

Intake Specialist notified via telephone: \_\_\_\_\_ Date & Time: \_\_\_\_ / \_\_\_\_ / \_\_\_\_\_, \_\_\_\_\_ hour.  
(Name)

☒ **POE Report/Notification Form forwarded to Intake Specialist Unit**

Date & Time: 03 / 16 / 2022 , 1521 hour. How?: ☒ e-mail ☐ Fax ☐ County mail

\*\*\*\*\*

**Section H: For Intake Specialist Unit Use Only** - DO NOT FILL OUT IF YOU ARE REPORTING A POTENTIAL VIOLATION TO THE INTAKE SPECIALIST UNIT.

Intake Specialist Name: Deputy X. Rosas Emp. #: 468743

Day, Date and time ISU received form Thursday / 03 / 17 / 2022 , 1140 hours.

☒ Referred to Equity Unit: Date & Time - 04 / 04 / 2022 , 1700 hours.

☐ If not referred to Equity Unit, explain in detail action taken:

---

---

---

Additional Information (if any): 

---

---

---

---

- ☐ Check here if this violation has already been reported. If so, this form should be attached to the already existing report as an addendum. If the existing report has already been forwarded to the Equity Unit or any other Department entity, this form should be forwarded as well.

CC:

- ☒ Equity Oversight Panel  
☒ Subject's Unit Commander  
☒ Reporting Party's Unit Commander  
☐ Victim's Unit Commander

# EXHIBIT C





**IV 2558101  
EXHIBIT C**

# MISCELLANEOUS DOCUMENTS

CONFIDENTIAL

COLA002189

EXHIBIT 25 - Page 526



SH-AD-703 Revised (2/22)

COUNTY OF LOS ANGELES  
**SHERIFF'S DEPARTMENT**  
*"A Tradition of Service Since 1850"*

DATE: June 27, 2022

FILE NO:

OFFICE CORRESPONDENCE

**FROM:** JASON P. WOLAK, COMMANDER  
PROFESSIONAL STANDARDS DIV.

**TO:** RON KOPPERUD, CAPTAIN  
INTERNAL AFFAIRS BUREAU

**SUBJECT: REQUEST FOR** INTERNAL AFFAIRS BUREAU ADMINISTRATIVE INVESTIGATION

Incident Date(s): (use semi-colons to separate multiple dates)

Between July 28, 2021, and March 2, 2022

Synopsis:

POE 22-046. It is alleged that Subject Villanueva made inappropriate POE related remarks while in the workplace.

Date a Sergeant, or above, became aware of an act, omission, or other misconduct:  
March 17, 2022

One Year Statute Date (If criminal monitor, leave blank): March 16, 2023

Alcohol Related? NO

Citizen Complaint? NO

If yes, SCR #:

Complainant's Name (Add employee number if a Department member)

Esther Lim, Supervisor's Deputy III, #662896

CONFIDENTIAL

COLA002190  
EXHIBIT 25 - Page 527

## REQUEST FOR IAB INVESTIGATION AND/OR CRIMINAL MONITOR

**Involved Subject** (For additional subjects, use Subject Continuation Page 703-A)

**Subject Name, Rank, Employee Number, and Unit of Assignment:**

Alex Villanueva, Sheriff, #246296, Office of the Sheriff

**Potential MPP Violation(s):**

3-01/121.10 - POE Discrimination; 3-01/121.15 - POE Sexual Harassment; 3-01/121.20 - POE Harassment Other than Sexual; 3-01/121.25 - POE Third Party Harassment; 3-01/121.30 - POE Inappropriate Conduct Toward Others; 3-01/121.35 - POE Retaliation

**Subject's Assignment/Duty Status:**

- ☒ Subject's assignment/duty status unchanged  
☐ Relieved of Duty (ROD), assigned to home ROD Date:  
☐ ROD, assigned to a relieved of duty position  
☐ Probationary Employee

**Justification for the subject's assignment/duty status (required):**

N/A

**Consideration(s) for IAB Request:**

\* Mandatory IAB Investigation

- ☐ Witnesses are spread over a large geographic area.  
☐ The nature of the allegation(s) involves incidents of high media attention.  
☐ A subject is a supervisor or manager (lieutenant or above; assistant director or above).  
☐ The nature of the allegation(s), if founded, will likely result in discharge.\*  
☐ The allegation(s) concern family/domestic violence.  
☐ The allegation(s) concern workplace violence.\*  
☐ The allegation(s) concern profiling or bias against members of the public.\*  
☒ Other: Allegations contain Policy of Equality\*

- ☐ Criminal Monitor by IAB (Refer to MPP 3-04/020.30 – Internal Administrative and Criminal Investigations) *enter investigating agency, crime, and report number.*

Supervisory Inquiry authored? ☐ Yes ☒ No

Contact person for source documents (i.e.: supervisory inquiry and/or investigative materials) at the requesting unit:

Prepared by Unit Commander/Director, or designee:

Lieutenant John Carter, #435532, Internal Affairs Bureau

**NOTE: Email this form to "IAB Investigation Requests." A review of this request will be conducted by the Internal Affairs Bureau. There may be situations when the Internal Affairs Bureau will decide, upon initial review, to return the case to be conducted as a unit level investigation.**

**For IAB use only**

Assigning Lieutenant Lieutenant John Carter, #435532

IAB Investigator Christine Diaz-Herrera, Esquire, Sanders Roberts LLP

COUNTY OF LOS ANGELES  
**SHERIFF'S DEPARTMENT**  
"A Tradition of Service Since 1850"

DATE: June 27, 2022

IV NO: 2558101

OFFICE CORRESPONDENCE

FROM:

EDWIN A. ALVAREZ, CHIEF  
PROFESSIONAL STANDARDS DIVISION

TO:

RON KOPPERUD, CAPTAIN  
INTERNAL AFFAIRS BUREAU**SUBJECT: SUBJECT OF ADMINISTRATIVE INVESTIGATION NOTIFICATION**

SUBJECT EMPLOYEE NAME, RANK, AND EMPLOYEE NUMBER.

Alex Villanueva, Sheriff, #246296

Department Knowledge Date (The date a sergeant, or above, became aware of an act, omission, or other misconduct):

03/17/2022

Potential MPP Violation(s) including, but not limited to:

3-01/030.10 POE - DISCRIMINATION  
3-01/121.15 POE - SEXUAL HARASSMENT  
3-01/121.20 POE - DISCRIMINATORY HARASSMENT (OTHER THAN SEXUAL)  
3-01/121.25 POE - THIRD PERSON HARASSMENT  
3-01/121.30 POE - INAPPROPRIATE CONDUCT TOWARD OTHERS  
3-01/121.35 POE - RETALIATION

Nature of the investigation (general description):

It is alleged you acted in an inappropriate POE related manner and made inappropriate POE related remarks while in the workplace.

You are advised that the authorization given by your Unit Commander to other supervisors to approve your routine absence requests has been rescinded. You are being ordered by your Unit Commander that during the time this investigation is active, any routine absence request must be submitted directly to him/her, and approval or denial of the request must come directly from them as well. You are additionally reminded of your responsibilities in submitting absence requests under **MPP 3-02/030.05 - ROUTINE ABSENCES**.

**SUBJECT EMPLOYEE ACKNOWLEDGEMENT OF NOTIFICATION:**Subject: [Signature]Witness: [Signature]

Employee #:

246296

Date:

6/29/22

Employee #:

410429

Date:

6/29/22

CONFIDENTIAL

COLA002192

EXHIBIT 25 - Page 529

Manual of Policy and Procedures : 3-01/121.10 - Policy of Equality - Discrimination

---

### **3-01/121.10 - Policy of Equality - Discrimination**

Discrimination is the disparate or adverse treatment of an individual based on or because of that individual's:

- Age (40 and over);
- Ancestry;
- Color;
- Denial of family and medical care leave;
- Disability (physical and mental, including HIV and AIDS);
- Ethnicity;
- Gender identity/gender expression;
- Genetic information;
- Marital status;
- Medical condition (genetic characteristics, cancer, or a record or history of cancer);
- Military or veteran status;
- National origin (including language use restrictions);
- Race;
- Religion (includes religious dress and grooming practices);
- Sex/gender (includes pregnancy, childbirth, breastfeeding, and/or related medical conditions);
- Sexual orientation; and
- Any other characteristic protected by state or federal law.

**Revised: 11/20/2020**

---

Manual of Policy and Procedures : 3-01/121.15 - Policy of Equality - Sexual Harassment

---

### **3-01/121.15 - Policy of Equality - Sexual Harassment**

Sexual harassment includes unwelcome sexual advances, requests for sexual favors, and other verbal, visual, or physical conduct of a sexual nature which meets any one of the following criteria:

- Submission to such conduct is made either explicitly or implicitly as term or condition of an individual's employment;
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- Such conduct has the purpose or effect of unreasonably interfering with the individual's employment or creating an intimidating, hostile, offensive, or abusive working environment, and a reasonable person subjected to the conduct would find that the harassment so altered working conditions as to make it more difficult to do the job.

**Revised: 11/20/2020**

---

---

Manual of Policy and Procedures : 3-01/121.20 - Policy of Equality - Harassment (Other Than Sexual)

---

### **3-01/121.20 - Policy of Equality - Harassment (Other Than Sexual)**

Harassment of an individual based on or because of the individual's protected characteristic is also discrimination and prohibited. Harassment is conduct which has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, offensive, or abusive work environment, and a reasonable person subjected to the conduct would find that the harassment so altered working conditions as to make it more difficult to do the job.

**Revised: 11/20/2020**

Manual of Policy and Procedures : 3-01/121.25 - Policy of Equality - Third-Person  
Harassment

---

### **3-01/121.25 - Policy of Equality - Third-Person Harassment**

Third person harassment is indirect harassment of a bystander, even if the person engaging in the conduct is unaware of the presence of the bystander. When an individual engages in potentially harassing behavior, they assumes the risk that someone may pass by or otherwise witness the behavior. The Department considers this to be the same as directing the harassment toward that individual.

**Revised: 11/20/2020**

Manual of Policy and Procedures : 3-01/121.30 - Policy of Equality - Inappropriate  
Conduct Toward Others

---

### **3-01/121.30 - Policy of Equality - Inappropriate Conduct Toward Others**

Inappropriate conduct toward others is any physical, verbal, or visual conduct based on or because of any of the protected characteristics described in this policy, when such conduct reasonably would be considered inappropriate for the workplace.

This provision is intended to stop inappropriate conduct based on a protected characteristic before it becomes discrimination, sexual harassment, retaliation, or harassment under this policy. As such, the conduct need not meet legally actionable state and/or federal standards to violate this policy. An isolated derogatory comment, joke, racial slur, sexual innuendo, etc., may constitute conduct that violates this policy and be grounds for discipline. Similarly, the conduct need not be unwelcome to the party against whom it is directed; if the conduct reasonably would be considered inappropriate by the Department for the workplace, it will violate this policy.

**Revised: 11/20/2020**

---



Manual of Policy and Procedures : 3-01/121.35 - Policy of Equality - Retaliation

---

### **3-01/121.35 - Policy of Equality - Retaliation**

Retaliation, for the purposes of this policy, is an adverse employment action against another for reporting protected incident, filing a complaint of conduct or opposing conduct that violates this policy or related state or federal law, participating in an investigation, administrative proceeding, or otherwise exercising their rights or performing their duties under this policy or related state or federal law.

**Revised: 11/20/2020**

**CONFIDENTIAL**

**COLA002199**

EXHIBIT 25 - Page 536

# EXHIBIT 26

# INVESTIGATOR'S LOG

<b>FILE NUMBER:</b>	IV2558101	
<b>INVESTIGATOR:</b>	Sanders Roberts LLP	
<b>DATE DEPARTMENT BECAME AWARE OF ALLEGATION(S):</b>	03/16/2022	
<b>DATE IAB INVESTIGATION INITIATED:</b>	06/27/2023	
<b>DATE SENT TO ADVOCACY UNIT:</b>		
<b>DATE RETURNED FROM ADVOCACY UNIT:</b>		
<b>DATE FORWARDED TO FORCE OR RISK REVIEW:</b>		
<b>DATE RETURNED FROM FORCE OR RISK REVIEW:</b>		
<b>DATE TO DIVISION:</b>		
<b>DATE RETURNED TO IAB:</b>		
<b>CASE SUMMARY:</b>		
<b>DATE</b>	<b>SUMMARY</b>	<b>NAME</b>
06/22/22	Attorney Client Privilege	Lt. Carter
06/23/22	Attorney Client Privilege	Lt. Carter
06/24/22	Commander Wolak called and informed me to handle this matter in the same fashion as the previous involved Sheriff cases.	Lt. Carter
07/07/2022	Per Ms. Real, hard case delivered to Ms. Diaz Herrera's office	Lt. Carter
08/03/22	Emailed Ms. Diaz Herrera for an update.	Lt. Carter
10/03/22	Sent email to Ms. Diaz Herrera re: case status.	Lt. Carter
10/13/22	All interviews have been completed, except for the Sheriff. Will attempt to schedule a date by 10/14/22.	Lt. Carter
11/02/22	Sent email to Ms. Diaz Herrera re: case status.	Lt. Carter
11/07/22	Re-inquired about case status.	Lt. Carter
11/14/22	Completed all the interviews necessary for the Huntsman matter, with exception of Sheriff Villanueva. She has reached out to Commander Satterfield to schedule Sheriff Villanueva's interview. She does not have a date sched for the interview yet.	Lt. Carter
11/30/22	I sent Commander Satterfield and Capt. Blanchard an email	Lt. Carter

## INVESTIGATOR'S LOG

	asking them to contact the attorney in order to set up an interview with Sheriff Villanueva.	
11/30/22	Commander Satterfield and Capt Blanchard called and informed me that they never received any requests for interviews for Sheriff Villanueva.	Lt. Carter
12/13/22	Sent email to Ms. Diaz Herrera regarding update.	Lt. Carter
01/04/23	Certified letter sent requesting an interview with the subject, Villanueva.	Lt. Carter
01/09/23	Former Sheriff Villanueva contacted the attorney.	Lt. Carter
01/12/23	Attorney Client Privilege	Lt. Carter
02/02/23	Sent an email requesting a case status.	Lt. Carter
02/21/23	Sent another email, no response.	Lt. Carter
03/05/23	Sent a 3 <sup>rd</sup> email requesting an update.	Lt. Carter
03/09/23	Ms. Diaz Herrera responded. Villanueva is not cooperating. Attorney Client Privilege	Lt. Carter
03/09/23	Briefed Chief Lecrivain and are moving forward with the case.	Lt. Carter
04/03/23	Per Ms. Diaz-Herrera, she advised Shawn Thomas was reassigned all 4 cases.	Lt. Carter
04/18/23	Sent email to new council Shawn Thomas regarding an update.	Lt. Carter
04/19/23	Received update- Outside counsel have undertaken to draft a final report using interview and relevant evidence.	Lt. Carter
05/15/23	Attorney Shawn Thomas sent an email stating he would send the Hunstman case back to IAB this week.	Lt. Carter
06/14/23	Emailed Mr. Thomas regarding 4 POE cases. 2 cases (Huntsman, Lim) are ready for pick up. IAB LET and Risk Management LET not available until next Tuesday (6/27/23).	Lt. Carter
07/05/23	Lt. Ann Devane took over the POE team, Lt. John Carter explained the process of reviewing, completing and stacking the case.	Lt. Devane
08/17/23	Reviewed zoom interview with Complainant Lim	Lt. Devane
08/24/23	Converted zoom interview to wave file to send out and have the interview transcribed	Lt. Devane
08/28/23	Received Transcripts	Lt. Devane



# INVESTIGATOR'S LOG

[illegible]

# **EXHIBIT 27**

**(SEPARATELY LODGED WITH COURT)**

## **NATIVE DOCUMENT PLACEHOLDER**

**Please review the native document COLA001970.mp4**

**COLA001970**



# **EXHIBIT 28**

**(SEPARATELY LODGED WITH COURT)**

**NATIVE DOCUMENT PLACEHOLDER**

**Please review the native document COLA001971.mp4**

**COLA001971**

# **EXHIBIT 29**

**(SEPARATELY LODGED WITH COURT)**

**NATIVE DOCUMENT PLACEHOLDER**

**Please review the native document COLA001972.mp4**

**COLA001972**

# **EXHIBIT 30**

**(SEPARATELY LODGED WITH COURT)**

**NATIVE DOCUMENT PLACEHOLDER**

**Please review the native document COLA001973.mp4**

**COLA001973**

# EXHIBIT 31

SH-AD-32A (3/23)

COUNTY OF LOS ANGELES  
**SHERIFF'S DEPARTMENT**  
*"A Tradition of Service Since 1850"*

DATE: October 17, 2023

FILE NO: IV 2558101

OFFICE CORRESPONDENCE

  
**FROM:** SERGIO V. ESCOBEDO  
ACTING COMMANDER  
PROFESSIONAL STANDARDS  
DIVISION

**TO:** COUNTY EQUITY  
OVERSIGHT PANEL

**SUBJECT: POSSIBLE MANUAL OF POLICY AND PROCEDURES VIOLATIONS**

The following Manual of Policy and Procedures violations relate to the allegations in this case, regarding **Alex Villanueva, Former Sheriff:**

**3-01/121.10 Policy of Equality – Discrimination (Based on Gender and Ethnicity)**

Disposition:

☒ Charge founded  
☐ Charge unresolved  
☐ Charge unfounded  
☐ Charge exonerated

**3-01/121.15 Policy of Equality – Sexual Harassment**

Disposition:

☐ Charge founded  
☐ Charge unresolved  
☒ Charge unfounded  
☐ Charge exonerated

**3-01/121.20 Policy of Equality – Discriminatory Harassment (Based on Gender and Ethnicity)**

Disposition:

☒ Charge founded  
☐ Charge unresolved  
☐ Charge unfounded  
☐ Charge exonerated



-2-

September 19, 2023

**3-01/121.25 Policy of Equality – Third Person Harassment (Based on Gender and Ethnicity)**

Disposition:

☒ Charge founded  
☐ Charge unresolved  
☐ Charge unfounded  
☐ Charge exonerated

**3-01/121.30 Policy of Equality – Inappropriate Conduct Toward Others (Based on Gender and Ethnicity)**

Disposition:

☒ Charge founded  
☐ Charge unresolved  
☐ Charge unfounded  
☐ Charge exonerated

**3-01/121.35 Policy of Equality – Retaliation (Based on Gender and Ethnicity)**

Disposition:

☒ Charge founded  
☐ Charge unresolved  
☐ Charge unfounded  
☐ Charge exonerated

**Discipline Assessment – Alex Villanueva, [REDACTED]**

**Review of Applicable “Guidelines for Discipline” Section:**

The Departmental “Guidelines for Discipline” (revised August 1, 2020) includes the Policy of Equality, and lists the following analogous misconduct with the associated disciplinary penalties:

CONDUCT	STANDARD DISCIPLINE
3-01/121.10 Policy of Equality – Discrimination (Based on Gender and Ethnicity)	Five (5) Days to Discharge

-3-

September 19, 2023

<b>3-01/121.15 Policy of Equality – Sexual Harassment</b>	<b>Five (5) Days to Discharge</b>
<b>3-01/121.20 Policy of Equality – Discriminatory Harassment (Based on Gender and Ethnicity)</b>	<b>Five (5) Days to Discharge</b>
<b>3-01/121.25 Policy of Equality – Third Person Harassment (Based on Gender and Ethnicity)</b>	<b>Written Reprimand to Discharge</b>
<b>3-01/121.30 Policy of Equality – Inappropriate Conduct Toward Others (Based on National Origin and Ethnicity)</b>	<b>Written Reprimand to Discharge</b>
<b>3-01/121.35 Policy of Equality – Retaliation (Based on Gender and Ethnicity)</b>	<b>Five (5) Days to Discharge</b>

**Determination of Discipline:**

Based upon the attached assessment of mitigating and aggravating factors, the following discipline has been determined to be appropriate. This discipline is subject to revision upon receipt of the Subject's response or grievance.

- ☐ Discharge  
☐ Reduction in Rank  
☐ Removal from Bonus Position  
☐ Suspension with loss of pay and benefits for \_\_\_\_ days with / without the option of EBD  
☐ Written Reprimand  
☐ No Discipline  
☒ Panel Recommends "Do Not Rehire" notation at top of file

SVE:WB:wb

SH-AD32A (3/23)

COUNTY OF LOS ANGELES  
**SHERIFF'S DEPARTMENT**  
*"A Tradition of Service Since 1850"*

DATE October 17, 2023

FILE NO IV2558101

OFFICE CORRESPONDENCE

  
**FROM:** SERGIO V. ESCOBEDO  
ACTING COMMANDER  
PROFESSIONAL STANDARDS  
DIVISION

**TO:** COUNTY EQUITY  
OVERSIGHT PANEL

**SUBJECT:** Alex Villanueva, # [REDACTED]  
Former Sheriff  
Office of the Sheriff  
Executive Division

The County Equity Oversight Panel, consisting of Constance Komoroski, Mercedes Cruz and Roberta Yang met by teleconference on October 17, 2023. Also attending the teleconference was Department representative Chief Laura Lecrivain.

Upon consideration of the facts developed in this investigation, the Panel determined that the Manual of Policy and Procedures section 3-01/121.15 Policy of Equality – *Sexual Harassment* was **unfounded**. Sections 3-01/121.10 Policy of Equality – *Discrimination (Based on Gender and Ethnicity)*, 3-01/121.20 Policy of Equality – *Discriminatory Harassment (Based on Gender and Ethnicity)*, 3-01/121.25 Policy of Equality – *Third Person Harassment (Based on Gender and Ethnicity)*, 3-01/121.30 Policy of Equality – *Inappropriate Conduct Toward Others (Based on Gender and Ethnicity)*, and 3-01/121.35 Policy of Equality – *Retaliation (Based on Gender and Ethnicity)* were **founded**.

The County Equity Oversight Panel recommended that the Subject should receive a **"Do Not Rehire"** notation at the top of their personnel file.

SVE:WB:wb

# EXHIBIT 32

For CISU Use:

(Method of Receipt)

Online

ICMS # 2022-112213

## COUNTY POLICY OF EQUITY

### REPORT / NOTIFICATION FORM

#### Methods of Reporting Potential County Policy of Equity (CPOE) Violations:

1. You may use this form to report a potential violation of the CPOE;
2. File an online complaint at <https://ceop.bos.lacounty.gov> (strongly encouraged);
3. Call the County Intake Specialist Unit (CISU) at (855) 999-CEOP (2367); or
4. Visit the CISU office at the Kenneth Hahn Hall of Administration building located at 500 West Temple Street, Suite B-26, Los Angeles, CA 90012.

---

#### 1. Do you wish to file this complaint anonymously?

☐

Yes (Do not check 'Yes' if you are a reporting supervisor/manager).

☒

No (If no, please proceed to Question #2).

#### 2. Are you filing this complaint for :

☐

Yourself (If filing this complaint for yourself, please start at Section A).

☒

Someone else (If you are filing this complaint for someone else, please start at Section A).

☐

Someone else: I am a reporting supervisor/manager (please start at Section A).

---

**Note to Supervisors/Managers:** As a County Manager/Supervisor, it is the County's expectation that the CPOE complaint notification be submitted online at <https://ceop.bos.lacounty.gov>.

**Section A: Reporting Party Information**

Today's Date: 03/09/2022

Name MAX HUNTSMAN Emp # e410745 Title INSPECTOR GENERAL (UC)  
Work # [REDACTED] Mobile # \_\_\_\_\_ Work Hrs \_\_\_\_\_  
RDO \_\_\_\_\_  
  
Department BOARD OF SUPERVISORS Dept Head \_\_\_\_\_  
OFFICE OF INSPECTOR  
Unit of Assignment GENERAL  
561 BRADFORD ST. PASADENA  
Work Address CA 91105  
Immediate Supervisor JEFFREY LEVINSON

Date & Time Form Completed: 03/09/2022 07:57 AM

Did the complainant notify a supervisor/manager of this complaint prior to now?

☐

Yes (if yes, fill in details):

Name of Supervisor Notified:

Date: NOT AVAILABLE

How:

☐

No

☐

Do not know

**Section B: Complainant(s) Information**

<b>Name</b>	<u>MAX HUNTSMAN</u>	<b>Emp #</b>	<u>e410745</u>	<b>Title</b>	<u>INSPECTOR GENERAL (UC)</u>
<b>Work #</b>	<u>[REDACTED]</u>	<b>Mobile #</b>	<u></u>	<b>Work Hrs</b>	<u></u>
				<b>RDO</b>	<u></u>
<b>Department</b>	<u>BOARD OF SUPERVISORS</u>	<b>Dept Head</b>	<u>Celia Zavala</u>		
<b>Unit of Assignment</b>	<u>OFFICE OF INSPECTOR</u>				
	<u>GENERAL</u>				
<b>Work Location</b>	<u>OFFICE OF INSPECTOR</u>				
	<u>GENERAL</u>				
<b>Immediate Supervisor</b>	<u>JEFFREY LEVINSON</u>				

**Section C: Alleged Involved Party(ies) Information**

<b>Name</b>	<u>ALEJANDRO VILLANUEVA</u>	<b>Emp #</b>	<u>e246296</u>	<b>Title</b>	<u>SHERIFF/UNCLASSIFIED</u>
<b>Work #</b>	<u>(562) 694-2400</u>	<b>Mobile #</b>	<u></u>	<b>Work Hrs</b>	<u></u>
				<b>RDO</b>	<u></u>
<b>Department</b>	<u>OTHER - Sheriff</u>	<b>Dept Head</b>	<u></u>		
<b>Unit of Assignment</b>	<u>OFFICE OF THE SHERIFF</u>				
<b>Work Location</b>	<u>HALL OF JUSTICE</u>				
<b>Immediate Supervisor</b>	<u></u>				



**Section D: Alleged Witness(es) Information (if they can be identified)**

**Section E: Nature of Complaint or Issue(s)**

1. What is the date of the alleged potential violation(s)? March 8, 2022

2. Please provide a detailed summary of the alleged potential violation(s):

As reported by RP/CP Huntsman: "...T]he Sheriff sent an email throughout the Sheriff's Department that was a racially biased attack." RP/CP writes, " My birth name was Max-Gustaf Edler. My father did not participate in raising me and so I took my mother's family name Huntsman as a law student with the help of a firm I clerked for. As Inspector General I have never used any name other than Max Huntsman, which is also my name on my driver's license and passport. A county computer system continues to incorrectly list my first name as Max-Gustaf and the sheriff has repeatedly referred to me as Max-Gustaf in public attacks. I believe this is dog whistling to the extremists he caters to as the more unusual name might lead some to view me as foreign (German or Jewish)."

3. Why does the Complainant(s) believe the treatment occurred/is occurring?:

Race

**Section F: TO BE COMPLETED BY SUPERVISORS/MANAGERS ONLY**

Date & time supervisor/manager observed and/or was notified of the alleged potential violation(s):

n/a

How was supervisor/manager made aware of the alleged potential violation(s)? (Explain in detail):

What action(s), if any, did the supervisor/manager take? (Explain in detail):

Did the supervisor/manager ascertain whether Complainant(s) is/are in need of any of the following? (If so, please explain in space provided):

Medical Attention: \_\_\_\_\_

Protection: \_\_\_\_\_

Separation from Alleged Involved Party  
(ies): \_\_\_\_\_

Other Assistance: \_\_\_\_\_

Did the supervisor/manager advise the Complainant(s) that they:

May seek confidential counseling or assistance from County's Employee Assistance Program (EAP) at (213) 738-4200.

May contact the County Intake Specialist Unit (CISU) directly at (855) 999-2367, or via email at [ceop@bos.lacounty.gov](mailto:ceop@bos.lacounty.gov)

**COMPLAINT SUBMISSION**

By submitting this complaint I am declaring, under penalty of perjury under the laws of the State of California, that:

- The facts set forth herein are true and correct and based on my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe to be true;
- I believe that the facts alleged herein are jurisdictional to the County Policy of Equity (accessible at: <https://ceop.bos.lacounty.gov>), are not duplicative of facts set forth in previously filed County Policy of Equity complaints that I have filed, and
- The filing of this County Policy of Equity complaint is not a misuse or abuse of the County's Policy of Equity Complaint Process.

MAX HUNTSMAN

Printed Name

\_\_\_\_\_  
Signature

March 9, 2022

Date

**OPTIONAL: Please provide the information below for statistical purposes only****Race/Ethnicity:**

*"The employer is subject to certain governmental recordkeeping and reporting requirements for the administration of civil rights laws and regulations. In order to comply with these laws, the employer invites employees to voluntarily self-identify their race or ethnicity. Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment. The information obtained will be kept confidential and may only be used in accordance with the provisions of applicable laws, executive orders, and regulations, including those that required the information to be summarized and reported to the federal government for civil rights enforcement. When reported, data will not identify any specific individual." - (eeoc.gov)*

☐ Hispanic or Latino - A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race.

☒ White (Not Hispanic or Latino) - A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

☐ Black or African-American (Not Hispanic or Latino) A person having origins in any of the black racial groups of Africa.

☐ Native Hawaiian or Other Pacific Islander (Not Hispanic or Latino) - A person having origins in any of the peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

☐ Asian (Not Hispanic or Latino) - A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian Subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

☐ American Indian or Alaska Native (Not Hispanic or Latino) - A person having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.

☐ Two or More Races (Not Hispanic or Latino) - All persons who identify with more than one of the above five races.

**Gender:**

☒ Male

☐ Female

☐ Prefer Not to Answer

**Date of Birth:** 01/17/1965

# EXHIBIT 33

**CISU ASSESSMENT FORM**

ICMS Number(s): 2022-112213	Final Overall Designation
Date CISU Received: March 9, 2022	<input type="checkbox"/> "A"
Sworn Personnel: None	<input type="checkbox"/> "B"
Approximate Statute Date: N/A	<input type="checkbox"/> "C"
	<input checked="" type="checkbox"/> "N"
	<input type="checkbox"/> "E"

**Reporting Party(ies)**

MAX HUNTSMAN, e410745, BOARD OF SUPERVISORS, INSPECTOR GENERAL (UC)

**Complainant(s):**

MAX HUNTSMAN, e410745, BOARD OF SUPERVISORS, INSPECTOR GENERAL (UC)

**Involved Party(ies):**

ALEJANDRO VILLANUEVA, e246296, SHERIFF, SHERIFF/UNCLASSIFIED

**Persons Interviewed**

**Assessment**

CP Huntsman (White) alleged that IP Villanueva (Hispanic or Latino) sent an email on 3/5/2022 within the Sheriff's Department that CP considered to be "a racially biased attacked" on CP. CP explains that CP's birth name was Max-Gustaf Edler but as Inspector General CP has only used the name Max Huntsman, which is reflected on CP's passport and driver's license. IP Villanueva has allegedly "repeatedly" referred to CP Huntsman as Max-Gustaf Huntsman "in public attacks" in an alleged effort to cause "extremists [IP] caters to" to view CP as either German or Jewish. For instance, CP also alleged that in a 3/6/2022 appearance on a KFI Radio show IP Villanueva acknowledged that CP no longer uses "Gustaf" as part of CP's name, which CP believes supports CP's allegation that IP "intentionally misnamed [CP] for the purpose of benefiting from the racial animosity that could trigger..." among extremists in IP's "audience."

IP Villanueva is the Los Angeles County Sheriff. The Sheriff's Department has its own equity process by which it internally addresses such complaints. Therefore, the facts alleged, even if taken as true, are unrelated to County employment or are otherwise non-jurisdictional under the County Policy of Equity. The County Intake Specialist Unit recommends an "N" designation for ICMS No. 2022-112213 and that the Sheriff's Department consider conducting an independent inquiry into the matter.

**Designation**

Based on the information contained in the Report Notification Form(s) and any data indicated on this intake assessment form and/or additional information, it has been determined that this complaint is designated as follows:

**Involved Party** ALEJANDRO VILLANUEVA, e246296, SHERIFF

Overall Designation: **N**

CP	Charge	Protected Basis	Designation
MAX HUNTSMAN	Sec. 1 Discrimination	Religion	N
MAX HUNTSMAN	Sec. 5 Inappropriate Conduct Towards Others	Religion	N
MAX HUNTSMAN	Sec. 1 Discrimination	Ethnicity	N
MAX HUNTSMAN	Sec. 3 Harassment	Ethnicity	N
MAX HUNTSMAN	Sec. 3 Harassment	Race	N
MAX HUNTSMAN	Sec. 3 Harassment	Religion	N
MAX HUNTSMAN	Sec. 5 Inappropriate Conduct Towards Others	Ethnicity	N
MAX HUNTSMAN	Sec. 5 Inappropriate Conduct Towards Others	Race	N
MAX HUNTSMAN	Sec. 1 Discrimination	Race	N

### **Designation definitions**

**"A" designation.** CISU has concluded that **facts alleged present a potential violation** of the County Policy Of Equity (CPOE), which could warrant discipline (written warning, suspension, or discharge) and therefore further investigation by the County Equity Investigations Unit (CEIU) is recommended. (Reasonable good faith belief standard).

**"B" designation.** CISU has concluded that although the situation may involve, or appear to involve, an equity issue, **the situation does not rise to the level of a potential violation** of the CPOE, which could warrant discipline (written warning, suspension, or discharge). (Reasonable good faith belief standard).

**"C" designation.** CISU has concluded that **the facts alleged, even if taken as true, are not jurisdictional** to the CPOE. (Reasonable good faith belief standard).

**"N" designation.** CISU has concluded that the facts alleged, even if taken as true, are unrelated to County employment or otherwise non-jurisdictional to the CPOE. (Reasonable good faith belief standard).

**"E" designation.** Indicates that the initial intake investigation reveals that a discrimination, harassment, and/or retaliation complaint was received by the County from an external agency, such as the California Department of Fair Employment and Housing (DFEH), and/or from the Federal Equal Employment Opportunity Commission (EEOC) and will now be assessed internally at the County for appropriate handling/designation. (Reasonable good faith belief standard).

**Administrative Process Disclaimer:** The analysis contained herein, including the terminology used, is the result of an administrative process and initial investigation under the County Policy of Equity.



The standards of proof and rules governing administrative investigatory and disciplinary processes are different from those that govern court proceedings. No legal conclusions can or should be drawn from this administrative analysis or the terminology contained therein and such would not be appropriate for consideration in any legal proceeding or court of law.

**Confidentiality Notice and Disclaimer:** This document may contain confidential and privileged information and is solely for the use of the person(s) or entity to whom it is intended. Any unauthorized review, use, disclosure, or distribution is prohibited.

Assessed by CISU Investigator: Nairi Gevorki

Reviewed by CEOP Panelist: Angela Reddock-Wright

Second Opinion Name:

CISU Investigation Complete Date: March 21, 2022

# EXHIBIT 34

## INTAKE ASSESSMENT FORM

Intake No. 22-045

Date Dept. Notified: 3/16/2022

Date ISU Received: 3/16/2022

Bouman Yes ☐ No ☒

☐ External

Case No.

Classification: "A"

<b>Alleged Complainant(s):</b>	<b>Involved Party(ies):</b>
Max Huntsman, #410745, Inspector General	Alejandro Villanueva, #246296, Sheriff
UOA: OIG	UOA: LASD

**Alleged Act(s) Of Harm**

**Alleged Protected Basis(es):**

- ☒ Harassment/HWE  
☐ Differential Treatment  
☒ Inappropriate Conduct  
☐ E-Mail Violation  
☐ Failure to Report  
☐ Retaliatory Treatment  
☐ Other:

- ☐ Sex  
☒ Race  
☐ Color  
☒ Ancestry  
☒ Religion

- ☐ Sexual Orientation  
☐ Marital Status  
☒ National Origin  
☐ Medical Condition  
☐ Engaging in a Protected Activity

- ☒ Ethnicity  
☐ Age (40 and Over)  
☐ Disability  
☐ Association  
☐ Other:

Based on the information contained in the POE Report/Notification Form and any data indicated on this intake assessment form and/or attachment(s), it has been determined that this complaint:

- ☒ Contains sufficient information to warrant further investigation by EIU  
☐ Contains equity issues, but the allegations do not rise to a level requiring a further investigation by EIU  
☐ No proven equity issues; and/or insufficient information showing causal connection to protected basis  
☐ I/P is a non-department member and/or allegation(s) is/are non-jurisdictional to the POE

**Persons Interviewed**

Date	Name	Emp #	Title	UOA
3/29/2022	Max Huntsman	410745	Inspector General	OIG
<b><u>Other Persons Referenced in Assessment:</u></b>				
	Jonathan A. Lested	467422	B-1 Deputy Sheriff	ISU
	Vickey Bane	N/A	Executive Director	CEOP
	Suon Sieberg	445349	Dep. Compliance Ofcr	ISU
	John L. Satterfield	410429	Commander	Ofc of the Sheriff

Intake #22-045  
Page 2

Explanation/Comments:

On Wednesday, March 16, 2022, B-1 Deputy Jonathan Lested, #467422, Intake Specialist Unit (ISU), completed and submitted a "Policy of Equality Report/Notification Form" (POE Report) on behalf of Complainant (CP) and Reporting Party (R/P) Max Huntsman (herein referred to as CP Inspector General Huntsman), #410745, Inspector General, Office of the Inspector General (OIG), (Non-LASD). CP Inspector General Huntsman alleged that Involved Party (I/P) Sheriff Alejandro (Alex) Villanueva, #246296, engaged in inappropriate conduct. B-1 Deputy Lested provided the following additional information:

(1) On March 16, 2022, the ISU received a County Policy of Equity Report/Notification Form (CPOE Report), ICMS #2022-112213, from CEOP Executive Director Vickey Bane, which was filed by R/P and CP Inspector General Huntsman on March 9, 2022.

(2) CP Inspector General Huntsman stated (verbatim): "The Sheriff sent an email throughout the Sheriff's Department that was a racially biased attack. My birth name was Max-Gustaf Edler. My father did not participate in raising me and so I took my mother's family name Huntsman as a law student with the help of a firm I clerked for. As Inspector General I have never used any name other than Max Huntsman, which is also my name on my driver's license and passport. A county computer system continues to incorrectly list my first name as Max-Gustaf and the sheriff has repeatedly referred to me as Max-Gustaf in public attacks. I believe this is dog whistling to the extremists he caters to as the more unusual name might lead some to view me as foreign (German or Jewish)."

(3) CP Inspector General Huntsman believes the treatment by I/P Sheriff Villanueva occurred because of race.

[ISU NOTE: On March 5, 2022, I/P Sheriff Villanueva sent an email announcement to Sheriff's employees titled, "Message from the Sheriff" that stated: "On Tuesday, March 1st, the corrupt Inspector General, Max-Gustaf Huntsman, told the Board of Supervisors that I've dismantled the discipline system within the department, without providing a shred of evidence. This is a lie". A copy of the announcement is contained in the intake folder for Intake #22-045.]

ISU Interview with CP Inspector General Huntsman:

On March 29, 2022, Deputy Compliance Officer (DCO) Suon Sieberg, #445349, ISU, conducted a recorded interview with CP Inspector General Huntsman. During the interview, CP Inspector General Huntsman provided the following information:

(1) CP Inspector General Huntsman stated, "The Sheriff, on a number of occasions, has made personal attacks against me and this is one of them" (referring to the email announcement by I/P Sheriff Villanueva). I/P Sheriff Villanueva's email announcement was in response to the OIG's report to the Board of Supervisors (BOS) that I/P Sheriff Villanueva dismantled discipline and had his supervisors close Internal Affairs cases against the Department's policy, and OIG's investigations into the alleged deputy gangs.

(2) I/P Sheriff Villanueva referred to him in the email announcement as "corrupt" and his report to the BOS was made without providing any facts. I/P Sheriff Villanueva was trying to designate him with the term "corrupt" and a "criminal", thereby making him a target for some of his constituents who are right-wing extremists, and be seen as a "foreigner".

(3) I/P Sheriff Villanueva's email to Department members contained a POE element whereby he was referred to as "Max-Gustaf Huntsman". I/P Sheriff Villanueva has called him Max-Gustaf in the past to "attack" him. CP Inspector General Huntsman does not use the name Gustaf. He stated, "My name is Max; it has been Max for many, many, many years".

(4) I/P Sheriff Villanueva would refer to CP Inspector General Huntsman as "Max-Gustaf Huntsman" during public attacks while in formal letters, he referred to him as "Max Huntsman". CP Inspector General Huntsman stated I/P Sheriff Villanueva "acknowledged on KFI that he knew that's [Max-Gustaf] not my name and that's why I believe he was doing it with racial malice, and as a political strategy".

Intake #22-045  
Page 3

(5) CP Inspector General Huntsman stated his name sounds German or Jewish. One of the groups he was investigating, the "Executioners", have a Nazi helmet tattoo and there are people who hate Jews and foreigners. I/P Sheriff Villanueva was using a name he knew CP Inspector General Huntsman did not use. I/P Sheriff Villanueva was characterising him in a particular way to gain political points. [ISU NOTE: CP Inspector General Huntsman stated "Executioners" was not a name the group used, but it's a name used to describe them.]

(6) CP Inspector General Huntsman stated, "That's why he dog-whistled in that way". He explained it is a political term to refer to using a phrase that is not immediately obvious as racist, or intended to appeal to extremists for I/P Sheriff Villanueva's purpose to get votes. He stated that this was "racially improper in a CPOE" and dangerous.

(7) CP Inspector General Huntsman stated that at one point, one of the County's computer systems had his original name, although his County paycheck and ID have his name as "Max Huntsman". The County knew his correct name but some of the computer systems were old and never got his name corrected. CP Inspector General Huntsman stated the State Bar also had his original name. After he became the Inspector General, he has since had his name corrected with the State Bar and County (CP Inspector General Huntsman did not provide the year).

[ISU NOTE: A search in the California Bar Association website revealed two results when conducting an attorney search under the name "Huntsman". One was "Huntsman, Max" and the other was "Huntsman Max-Gustaf". The status was active for both names. However upon selection, the attorney profile listed under both results was "Max Huntsman".]

(8) CP Inspector General Huntsman explained his family history, including his father was born in Berlin, Germany and moved to the United States. His name was spelled with an "f" in a Swedish spelling, which was a name after a relative. I/P Sheriff Villanueva had recently spelled it with the letter "v", which is a German spelling. CP Inspector General Huntsman stated this incorrect spelling showed I/P Sheriff's Villanueva's intent in trying to make him sound German.

(9) CP Inspector General Huntsman's passport had his name as Max Huntsman which enabled him to change his name with the County and State, as opposed to filing a name change at the courts. He never used Max-Gustaf during his County service, except that it was a County system, while he filed his taxes with the IRS or when he dealt with the federal government. He always used Max when he wrote letters as the Deputy District Attorney, prior to becoming the Inspector General.

(10) CP Inspector General Huntsman became "very upset and very concerned" when he became aware of the email sent by I/P Sheriff Villanueva. He did not inform the CPOE as a Complainant but did it under law. In the County Policy, as manager with employees who were negatively impacted by the Sheriff's conduct, he had a duty to report it.

(11) CP Inspector General Huntsman stated he has never corrected I/P Sheriff Villanueva about his name. I/P Sheriff Villanueva's statement on KFI radio made it clear that he knew CP Inspector General Huntsman's correct name.

I/P Sheriff Villanueva's statement on KFI Radio:

DCO Sieberg reviewed the referenced KFI radio show wherein on March 6, 2022, I/P Sheriff Villanueva was hosting a "live and unscripted" show. I/P Sheriff Villanueva stated, "Our Inspector General, the one and only Max-Gustaf Huntsman. Yes, he's dropped the Gustaf for some reason. There might be a story behind that I understand is in the works. We'll see about that as it develops, why did he drop Gustaf"?

[ISU NOTE: This comment was referenced in the LA Times on April 1, 2022, in an article titled, "Sheriff Villanueva makes ugly, unfounded claim against county watchdog" (<https://www.latimes.com/california/story/2022-04-01/inspector-general-sheriff-villanueva>).]

Intake #22-045  
Page 4

Additional Information Provided by CP Inspector General Huntsman:

CP Inspector General Huntsman provided the following additional information to the ISU:

(1) On March 30, 2022, CP Inspector General Huntsman forwarded a copy of his email exchange with Vickey Bane, addressing the alleged conduct of I/P Sheriff Villanueva, which contained the following information (referenced in part):

a. CP Inspector General Huntsman stated, "As you can see from the email chain, the Sheriff sent an email throughout the Sheriff's Department that was a racially biased attack. Because I am a manager and the Sheriff's conduct impacts my employees as well, I believe I am legally required to report this to you."

b. "Here is a recording in comments he made on the radio about my name:

"<https://kfiam640.iheart.com/content/2022-03-06-la-county-sheriff-alex-villanueva-live-and-unscripted-on-deputy-gangs/>".

(2) On March 30, 2022, CP Inspector General Huntsman sent DCO Sieberg an email and stated, "The Sheriff just told the editorial board of the Times that I am a Holocaust denier. When asked what evidence he had of that, he said he had none. When asked who told him that, he declined to say".

(3) On March 31, 2022, CP Inspector General Huntsman sent DCO Sieberg an email and stated, "For your file here is the response to the Sheriff's Holocaust claim which I sent yesterday to the Board of Supervisors, my employers". CP Inspector General Huntsman included a copy of his email to the BOS.

(4) On April 1, 2022, CP Inspector General Huntsman sent DCO Sieberg an email and stated, "I'm not blaming you, but be sure to tell all the victims you interview that the LASD CPOE process is not confidential and the Sheriff will discuss them with the media. CP Inspector General Huntsman provided a link to an April 1, 2022, article related to him and I/P Sheriff Villanueva (<https://www.latimes.com/opinion/story/2022-04-01/alex-villanueva-max-huntsman-holocaust-denial>).

[ISU NOTE: The above link provided an article in which I/P Sheriff Villanueva made the statement, "You do realize that Max Huntsman, one, he's a Holocaust denier. I don't know if you're aware of that. I have it from two separate sources. And he filed a complaint against me because I refer to him as Max-Gustaf Huntsman, his actual legal name, that's on his [State] Bar card. And he filed a complaint to the — I thought that was kind of humorous."]

[ISU NOTE: Copies of the email exchanges from CP Inspector General Huntsman are contained in the intake folder for Intake #22-045.]

Additional Information:

The following information was compiled, as it may provide further information related to Intake #22-045:

(1) On December 4, 2021, in a congratulatory letter from CP Inspector General Huntsman to I/P Sheriff Villanueva, I/P Inspector General Huntsman identified himself as "Max Huntsman, Inspector General".

(2) On October 5, 2020, in a Sheriff's Department's news release titled, "Max Huntsman Omits the Facts Once Again," I/P Sheriff Villanueva addressed CP Inspector General Huntsman as "Max Huntsman".

(3) On February 18, 2021, in a letter to the BOS, I/P Sheriff Villanueva addressed CP Inspector General Huntsman as "Max-Gustaf Huntsman".

(4) In a Tweet sent on March 22, 2022, I/P Sheriff Villanueva stated, "Once again, we have received unproved allegations alleging 'deputy gangs' by Inspector General Max-Gustav Huntsman. Sheriff Alex Villanueva remains committed to transparency and accountability." [ISU NOTE: It was noted the letter "v" was used instead of Gustaf.]

[ISU NOTE: Copies of the documents referenced in this section are contained in the intake folder for Intake #22-045.]

Intake #22-045  
Page 5

**On-line Resources:**

The below on-line articles discussed the subject of people's name and how it can influence people:

(1) An article written by the University of Manchester titled, "Four ways your name can affect your job prospects" stated, "What's in a name? A lot, according to research. Your name can have a huge influence on your prospects in life. Much of this is due to bias, stereotyping and other rules of thumb that people employ when making judgements about others...But even if you don't disclose these features...our names can suggest much about us," including ethnicity, alphabetical position, gender, and age. (<https://www.manchester.ac.uk/discover/news/four-ways-your-name-can-affect-your-job-prospects/>).

(2) An article titled, "This Study Shows Name and Race-Based Discrimination Go Even Deeper Than You Think" stated, "Contrary to famous suppositions by Shakespeare, there is quite a lot in a name. Our names are literally how we introduce ourselves to the world, our initial identifier, often our first foot in the door at work or school. Our names also influence the way we are perceived and, unfortunately, not all names are treated equally (<https://www.bustle.com/p/a-new-study-on-name-discrimination-suggests-names-signaling-race-are-also-linked-to-social-status-2348497>).

[ISU NOTE: Copies of the referenced articles are contained in the intake folder for Intake #22-045.]

**Admonishment/Supervisory Actions:**

Commander John L. Satterfield, #410429, Office of the Sheriff, advised that I/P Sheriff Villanueva was admonished on March 23, 2022.

**Prior Related POE Complaint(s):**

☐ None ☒ Prior Related POE Complaint(s) Identified Below

A review of the intake records from 2003 to 2022 revealed prior POE complaints involving Sheriff Villanueva as an I/P.

(1) In Intake #04-177, a named Complainant (female volunteer) alleged a named I/P (male volunteer) called her a "bitch". I/P (then) Sgt. Villanueva and another named I/P failed to report the alleged conduct. Intake #04-177, received an "A" classification.

(2) In Intake #04-221, a named CP alleged a named I/P used an inappropriate term, "Bitches and Whores". I/P (then) Sgt. Villanueva and two other named I/Ps failed to report the alleged conduct. Intake #04-221 received an "A" classification.

(3) In Intake #12-019, a named CP alleged I/P (then) Lt. Villanueva made a "racial slur" toward another named CP. Intake #12-019 received an "A" classification.

(4) In Intake #21-108, an anonymous Complainant alleged that I/P Villanueva engaged in conduct linked to race, national origin and ethnicity. Intake #21-108 received a "B" classification.

(5) In Intake #22-046, a named CP alleged I/P Sheriff Villanueva subjected her to disparaging remarks based on her age, sex, race, national origin, ancestry, and ethnicity. Intake #22-046 received an "A" classification.

**Conclusion:**

3-01/121.10 - Policy of Equality – Discrimination

3-01/121.20 - Policy of Equality - Harassment (Other Than Sexual)

3-01/121.25 - Policy of Equality - Third-Person Harassment

3-01/121.30 - Policy of Equality - Inappropriate Conduct Toward Others

3-01/121.40 - Policy of Equality - Examples of Conduct That May Violate This Policy and Scope of Coverage



Intake #22-045  
Page 6

The POE Report indicated CP Inspector General Max Huntsman alleged I/P Sheriff Villanueva engaged in inappropriate conduct that was linked to race by referring to him as "Max-Gustaf" in an email sent throughout the Sheriff's Department. CP Inspector General Huntsman considered this to be a "racially biased attack".

During his ISU Interview, CP Inspector General Huntsman confirmed his complaint and the email in question was the Department's announcement sent by I/P Sheriff Villanueva on March 5, 2022. CP Inspector General Huntsman stated I/P Sheriff Villanueva made "personal attacks" against him and the email was one of them.

CP Inspector General Huntsman stated I/P Sheriff Villanueva was trying to make CP Inspector General Huntsman be seen as a "foreigner" by his (Villanueva) constituents by referring to him as "Max-Gustaf"; a name that he does not use. CP Inspector General Huntsman stated his name "Max-Gustaf" sounds German or Jewish which was given to him by his German-born father.

For personal reasons, he changed his name from "Max-Gustaf Edler" to "Max Huntsman". In his official capacity as the County's Inspector General (since 2013) and while he was the Deputy District Attorney, CP Inspector General Huntsman always used the name "Max Huntsman", although one of the County's computer systems and the State Bar still had his original name until he had it corrected. CP Inspector General Huntsman stated I/P Sheriff Villanueva referred to him as "Max-Gustaf" during "public attacks"; however, in formal letters, I/P Sheriff Villanueva referred to him and as "Max Huntsman".

A review of information by the ISU confirmed I/P Sheriff Villanueva referred to CP Inspector General, in writing and in speech, as "Max-Gustaf" or "Max-Gustav". On the March 6, 2022, in a recorded KFI radio show called "L.A. County Sheriff Alex Villanueva Live and Unscripted," I/P Sheriff Villanueva acknowledged CP Inspector General Huntsman had changed his name and does not use the name "Gustaf". On March 22, 2022, in a Tweet, I/P Sheriff Villanueva commented, "Once again, we have received unproven allegations alleging 'deputy gangs' by Inspector General Max-Gustav Huntsman" [ISU NOTE: It is noted that in this instance, 'Gustaf' was spelled with the letter "v".]

On-line resources emphasized that one's name can be perceived by others as connected to one's ethnicity and race. I/P Sheriff Villanueva stated he was aware of CP Inspector General Huntsman's name change and referred to CP Inspector General Huntsman as "Max-Gustaf" or Max-Gustav" during his public speech. It appears CP Inspector General Huntsman perceived I/P Sheriff Villanueva's calling him "Max-Gustaf/Gustav" was made in reference to CP Inspector General Huntsman's racial/ethnic background.

The alleged conduct (referring to CP Inspector General Max Huntsman as "Max-Gustaf;" a name he does not use) appears to concern protected categories (race, ancestry, religion, national origin, ethnicity) enumerated under the Policy of Equality (POE). Based on the nature of the allegations against the highest ranking member of the Department, and the ongoing nature of the harm, the alleged conduct warrants further investigation by the Equity Investigations Unit (EIU). Accordingly, an "A" classification is recommended for Intake #22-045.



Intake #22-045  
Page 7

**RECOMMENDATION(S) for UOA, including, but not limited to the following:**

- ☐ Informal conflict resolution with all parties involved, by appropriate supervisor
- ☐ DHR assisted mediation \_\_\_\_\_
- ☐ Referral to Equity Compliance Unit/ADA \_\_\_\_\_
- ☐ Referral to Equity Compliance Unit/AA \_\_\_\_\_
- ☐ Supervisory inquiry/unit level investigation for Non-Equity based allegations of misconduct, if appropriate
- ☐ Counseling with PLE regarding the conduct in question, if appropriate
- ☐ Re-briefing applicable provisions of the Policy Of Equality (POE):
  - ☐ POE Sexual Harassment
  - ☐ POE Discriminatory Harassment
  - ☐ POE Inappropriate Conduct
  - ☐ POE Third Person Harassment
  - ☐ Other: \_\_\_\_\_
  - ☐ POE Retaliation
  - ☐ POE Duties of Supervisors
  - ☐ POE Examples of Conduct
  - ☐ POE Discrimination
- ☐ Re-briefing applicable provisions of the Manual of Policy & Procedures (MPP):
  - ☐ Manner of Giving Orders & Instructions
  - ☐ Relationship with Subordinates
  - ☐ Permissible Use
  - ☐ General Behavior
  - ☐ Other: \_\_\_\_\_
  - ☐ Conduct Toward Others
  - ☐ Derogatory Language
  - ☐ System Use
  - ☐ Professional Conduct
- ☐ Re-briefing applicable "Lessons Learned" Bulletins:
  - ☐ Supervisor Responsibility-Duty to Report
  - ☐ Being Offended Is Not An Element
  - ☐ E-mail - Supervisor Responsibility
  - ☐ Religious Accommodation and Etiquette
  - ☐ Sexual Gossip in the Workplace
  - ☐ Lactation Accommodation
  - ☐ Other: \_\_\_\_\_
  - ☐ ADA Title I Employment Rights
  - ☐ E-mail - Common Electronic Workplace Violations
  - ☐ Languages in the Workplace
  - ☐ Prevention is Still the Best Cure - Supervisor
  - ☐ Hostile Work Environment under the POE
  - ☐ Professional Conduct - Persons With Disabilities
- ☐ Training/Briefing:
  - ☐ Disability Awareness/Etiquette
  - ☐ Team Building Skills
  - ☐ Respect Based Leadership
  - ☐ Diversity/Inclusion/Cultural Awareness
  - ☐ Effective Communication
  - ☐ Interactive Process/Reasonable Accommodation
  - ☐ Medical Management/Health Care
  - ☐ Sexual Harassment Prevention
  - ☐ Relationship Management
  - ☐ Other: \_\_\_\_\_
- ☐ Re-briefing RMB's "Risky Business" newsletters and FOSS newsletter:
  - ☐ RMB - Use of Derogatory Terms or Phrases (Vol. 12, No. 03)
  - ☐ FOSS - Inappropriate Terms & Phrases-Related Lawsuit (Vol. 14, No. 15)
  - ☐ RMB - Inappropriate Behavior (Vol. 15, No. 04)
  - ☐ Other: \_\_\_\_\_
- ☐ Submit Copy of APIS Roster for Attendees of Re-Briefing and/or Training
- ☐ As may be appropriate, it is recommended that the Unit Commander or his/her designee inform the Involved Party and Complainant that the complaint was addressed.
- ☐ Other Recommendation(s): \_\_\_\_\_  
\_\_\_\_\_

Intake #22-045  
Page 8

**Assessed by ISU Deputy Compliance Officer:**

DCO Suon Sieberg	Date Assessed: 4/7/2022	Date Received: 3/16/2022
------------------	-------------------------	--------------------------

**Reviewed by ISU Lieutenant or Sergeant:**

Sgt Minerva Garrido	Date: 4/7/2022
---------------------	----------------

**Forwarded to CEOP by:**

B-1 Deputy Jonathan Lested	Date: 04/07/22
----------------------------	----------------

**Reviewed by CEOP:**

	Date:
--	-------

**CEOP Comments:**

--

CONFIDENTIAL

# EXHIBIT 35

**For I.S.U. Use Only**  
Method of Receipt  
☐ Telephone  
☐ In Person  
☐ POE Report Form  
☒ Other: CPOE  
Intake # 22-045

## **Policy of Equality**

### **Report / Notification Form**

**General Instructions:** Use this form to report a potential violation of the Policy of Equality. Non-supervisors may also report a potential violation of the Policy of Equality by calling the Intake Specialist Unit at (323) 890-5371 or visiting them at 4900 S. Eastern Avenue, Suite 203, Commerce

\*\*\*\*\*

## Section A: Reporting Party Information

Today's Date: 03 / 17 / 2022

Name: Huntsman, Max Emp. #: 410745 Rank/Title Inspector General

Work Tel# [REDACTED] ; Home Tel# [REDACTED] ; Work Hours [REDACTED] - [REDACTED] RDO [REDACTED]

Unit of Assignment: Office of Inspector General Unit Commander: Jeffrey Levinson

Division LA County Board of Supervisors

Name of Supervisor Completing this form (if different from above): B-1 Deputy Jonathan Lested # 467422

Date & Time form completed: 03 / 17 / 2022 1200 hours.

☐ Anonymous (Do not provide identifying information above if anonymous. You must, however, fill out the rest of the form. **Do not check if you are a reporting supervisor.**)

Did the complainant and/or alleged victim notify a supervisor of this complaint prior to now?

☐ Yes (if yes, fill in details)

Who: \_\_\_\_\_

When: Date:        /        /        Time:        hours.

## How

☐ No

Do not know

\*\*\*\*\*

## Section B: Date And Time of Potential Violation

Day, Date and time alleged violation / alleged incident occurred: 03 / 08 / 2022, \_\_\_\_\_ hours or  
between \_\_\_\_\_ / \_\_\_\_\_ and \_\_\_\_\_ / \_\_\_\_\_

If multiple incidents or unknown, explain:  
See narrative.

\*\*\*\*\*

Section C: Alleged Complainant(s) (if not the same as the Reporting Party and if they can be identified)

Same as RP \_\_\_\_\_ Employee # \_\_\_\_\_ Rank/Title \_\_\_\_\_ UOA \_\_\_\_\_

Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_

Employee # \_\_\_\_\_ Rank/Title \_\_\_\_\_ UOA \_\_\_\_\_

Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_

Employee # \_\_\_\_\_ Rank/Title \_\_\_\_\_ UOA \_\_\_\_\_

Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_

\*\*\*\*\*

Section D: Alleged Involved Party(ies) (if they can be identified)

Villanueva, Alejandro (Sheriff) Employee # 246296 UOA Office of Sheriff  
\_\_\_\_ Employee # \_\_\_\_\_ UOA \_\_\_\_\_  
\_\_\_\_ Employee # \_\_\_\_\_ UOA \_\_\_\_\_  
\_\_\_\_ Employee # \_\_\_\_\_ UOA \_\_\_\_\_

\*\*\*\*\*

Section E: Alleged Witness(es) (if they can be identified)

None Stated Employee # \_\_\_\_\_ Rank/Title \_\_\_\_\_ UOA \_\_\_\_\_  
Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_  
\_\_\_\_ Employee # \_\_\_\_\_ Rank/Title \_\_\_\_\_ UOA \_\_\_\_\_  
Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_  
\_\_\_\_ Employee # \_\_\_\_\_ Rank/Title \_\_\_\_\_ UOA \_\_\_\_\_  
Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_  
\_\_\_\_ Employee # \_\_\_\_\_ Rank/Title \_\_\_\_\_ UOA \_\_\_\_\_  
Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_

\*\*\*\*\*

Section F: Nature of the Complaint or Issue(s) -- Be as detailed as possible, include all incidents & evidence.

On March 16, 2022, the ISU received a County Policy of Equity report (ICMS #2022-112213) from CEOP Executive Director Vickey Bane, filed by RP/CP Max Huntsman on March 9, 2022. The narrative of the complaint stated, in part, the following

(verbatim): "...The Sheriff sent an email throughout the Sheriff's Department that was a racially biased attack."

"My birth name was Max-Gustaf Edler. My father did not participate in raising me and so I took my mother's family name Huntsman as a law student with the help of a firm I clerked for. As Inspector General I have never used any name other than Max Huntsman, which is also my name on my driver's license and passport. A county computer system continues to incorrectly list my first name as Max-Gustaf and the sheriff has repeatedly referred to me as Max-Gustaf in public attacks. I believe this is dog whistling to the extremists he caters to as the more unusual name might lead some to view me as

Ask: "Why do you believe this treatment is occurring?" ( ☒ Check, if narrative is continued onto the next page)  
Race \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Section F (cont'd): Nature of the Complaint or Issue(s) -- Be as detailed as possible, include all incidents & evidence.

foreign (German or Jewish)."

(ISU Note: For details, refer to copy of CPOE complaint contained in ISU efile.)

\*\*\*\*\*

Note: Continue onto the next page

Section G: Supervisor -- FOR NON-VICTIM SUPERVISORY USE ONLY. DO NOT FILL OUT THIS SECTION IF YOU ARE THE ALLEGED VICTIM OR A NON-SUPERVISOR.

Date & Time notified of potential violation / observation was made: 03 / 16 / 2022 , 1521 hours.

How did you become aware of the potential violation (explain in detail):  
The ISU received CPOE ICMS #2022-112213, containing the above allegations.

Supervisor's Actions (if any) (explain in detail)

A POE Report was generated by ISU Deputy Jonathan Lested to document the allegation in the County Policy of Equity

Complaint.

Did you ascertain whether complainant(s) and/or victim(s) are in need of:

- ☒ Medical Attention  
**Response:** to be ascertained
- ☒ Protection  
**Response:** to be ascertained
- ☒ Other Assistance  
**Response:** to be ascertained

Advised the complainant(s) and/or victim(s) that they:

- ☒ May seek confidential counseling or assistance from Employee Support Services

Notifications:

☐ **Intake Specialist Unit phone notification:** (During business hours, direct telephone (323) 890-5371. After hours, request through Sheriff's Headquarter's Bureau (323) 526-5541)

Intake Specialist notified via telephone: \_\_\_\_\_ Date & Time: \_\_\_\_ / \_\_\_\_ / \_\_\_\_\_, \_\_\_\_\_ hour.  
(Name)

☒ **POE Report/Notification Form forwarded to Intake Specialist Unit**

Date & Time: 03 / 16 / 2022 , 1521 hour. How?: ☒ e-mail ☐ Fax ☐ County mail

\*\*\*\*\*

Section H: **For Intake Specialist Unit Use Only** - DO NOT FILL OUT IF YOU ARE REPORTING A POTENTIAL VIOLATION TO THE INTAKE SPECIALIST UNIT.

Intake Specialist Name: B-1 Deputy Jonathan A. Lested Emp. #: 467422

Day, Date and time ISU received form Thursday / 03 / 17 / 2022 , 1215 hours.

☐ Referred to Equity Unit: Date & Time - \_\_\_\_ / \_\_\_\_ / \_\_\_\_ , \_\_\_\_ hours.

☒ If not referred to Equity Unit, explain in detail action taken:

"B" assessment authored by DCO Sieberg received on 04/07/2022.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Additional Information (if any): \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- ☐ Check here if this violation has already been reported. If so, this form should be attached to the already existing report as an addendum. If the existing report has already been forwarded to the Equity Unit or any other Department entity, this form should be forwarded as well.

CC:

- ☒ Equity Oversight Panel  
☐ Subject's Unit Commander  
☐ Reporting Party's Unit Commander  
☐ Victim's Unit Commander



# EXHIBIT 36

COUNTY OF LOS ANGELES  
**SHERIFF'S DEPARTMENT**  
"A Tradition of Service Since 1850"

DATE: June 27, 2022

IV NO: 2558097

OFFICE CORRESPONDENCE

FROM:

EDWIN A. ALVAREZ, CHIEF  
PROFESSIONAL STANDARDS DIVISION

TO:

RON KOPPERUD, CAPTAIN  
INTERNAL AFFAIRS BUREAU**SUBJECT: SUBJECT OF ADMINISTRATIVE INVESTIGATION NOTIFICATION**

SUBJECT EMPLOYEE NAME, RANK, AND EMPLOYEE NUMBER:

Alex Villanueva, Sheriff, #246296

Department Knowledge Date (The date a sergeant, or above, became aware of an act, omission, or other misconduct):

03/16/2022

Potential MPP Violation(s) including, but not limited to:

3-01/121.10 POE - DISCRIMINATION  
3-01/121.20 POE - DISCRIMINATORY HARASSMENT (OTHER THAN SEXUAL)  
3-01/121.25 POE - THIRD PERSON HARASSMENT  
3-01/121.35 POE - RETALIATION

Nature of the investigation (general description):

It is alleged you acted in an inappropriate POE related manner and in the workplace.

You are advised that the authorization given by your Unit Commander to other supervisors to approve your routine absence requests has been rescinded. You are being ordered by your Unit Commander that during the time this investigation is active, any routine absence request must be submitted directly to him/her, and approval or denial of the request must come directly from them as well. You are additionally reminded of your responsibilities in submitting absence requests under **MPP 3-02/030.05 - ROUTINE ABSENCES**.

**SUBJECT EMPLOYEE ACKNOWLEDGEMENT OF NOTIFICATION:**Subject: [Signature]Witness: [Signature]

Employee #:

246296

Date:

6/29/22

Employee #:

410429

Date:

6/29/22

CONFIDENTIAL

COLA002114

EXHIBIT 36 - Page 584

---

Manual of Policy and Procedures : 3-01/121.10 - Policy of Equality - Discrimination

---

### **3-01/121.10 - Policy of Equality - Discrimination**

Discrimination is the disparate or adverse treatment of an individual based on or because of that individual's:

- Age (40 and over);
- Ancestry;
- Color;
- Denial of family and medical care leave;
- Disability (physical and mental, including HIV and AIDS);
- Ethnicity;
- Gender identity/gender expression;
- Genetic information;
- Marital status;
- Medical condition (genetic characteristics, cancer, or a record or history of cancer);
- Military or veteran status;
- National origin (including language use restrictions);
- Race;
- Religion (includes religious dress and grooming practices);
- Sex/gender (includes pregnancy, childbirth, breastfeeding, and/or related medical conditions);
- Sexual orientation; and
- Any other characteristic protected by state or federal law.

**Revised: 11/20/2020**

---

Manual of Policy and Procedures : 3-01/121.20 - Policy of Equality - Harassment (Other  
Than Sexual)

---

### **3-01/121.20 - Policy of Equality - Harassment (Other Than Sexual)**

Harassment of an individual based on or because of the individual's protected characteristic is also discrimination and prohibited. Harassment is conduct which has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, offensive, or abusive work environment, and a reasonable person subjected to the conduct would find that the harassment so altered working conditions as to make it more difficult to do the job.

**Revised: 11/20/2020**

---



Manual of Policy and Procedures : 3-01/121.25 - Policy of Equality - Third-Person  
Harassment

---

### **3-01/121.25 - Policy of Equality - Third-Person Harassment**

Third person harassment is indirect harassment of a bystander, even if the person engaging in the conduct is unaware of the presence of the bystander. When an individual engages in potentially harassing behavior, they assumes the risk that someone may pass by or otherwise witness the behavior. The Department considers this to be the same as directing the harassment toward that individual.

**Revised: 11/20/2020**

---

Manual of Policy and Procedures : 3-01/121.30 - Policy of Equality - Inappropriate  
Conduct Toward Others

---

### **3-01/121.30 - Policy of Equality - Inappropriate Conduct Toward Others**

Inappropriate conduct toward others is any physical, verbal, or visual conduct based on or because of any of the protected characteristics described in this policy, when such conduct reasonably would be considered inappropriate for the workplace.

This provision is intended to stop inappropriate conduct based on a protected characteristic before it becomes discrimination, sexual harassment, retaliation, or harassment under this policy. As such, the conduct need not meet legally actionable state and/or federal standards to violate this policy. An isolated derogatory comment, joke, racial slur, sexual innuendo, etc., may constitute conduct that violates this policy and be grounds for discipline. Similarly, the conduct need not be unwelcome to the party against whom it is directed; if the conduct reasonably would be considered inappropriate by the Department for the workplace, it will violate this policy.

**Revised: 11/20/2020**

---

# EXHIBIT 37



# OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ROBERT G. LUNA, SHERIFF



January 4, 2023

Mr. Alejandro Villanueva  
2183 El Cajonita Drive,  
La Habra, California 90631

Dear Mr. Villanueva:

## ADMINISTRATIVE INVESTIGATION INTERVIEW REQUEST

The Los Angeles County Sheriff's Department is conducting an administrative investigation into a matter in which you are a subject.

The incident occurred at/on March 16, 2022. It is our Department's policy to conduct complete and thorough investigations into complaints or allegations of violations of Department policy on the part of our employees; therefore, it is important that you be interviewed.

Please contact Ms. Christine Diaz-Herrera, attorney at law from Sanders Roberts LLP, at (213) 426-5000 extension 6889 or via email at [cdiazherrera@sandersroberts.com](mailto:cdiazherrera@sandersroberts.com), to schedule an interview in person or via telephone. Your cooperation in this matter is appreciated.

If you have any questions, you may also contact Lieutenant John L. Carter at (323) 890-5304.

Sincerely,

ROBERT G. LUNA, SHERIFF

  
Ron Kopperud, Captain  
Internal Affairs Bureau

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1851 —

AV009864

EXHIBIT 37 - Page 590



# EXHIBIT 38



# LOS ANGELES COUNTY SHERIFF'S DEPARTMENT

*"A Tradition of Service Since 1850"*

Incident Date: Between March 5, 2022 & March 22, 2022  
Department Knowledge: March 16, 2022  
Statute Date: March 15, 2023

## INTERNAL AFFAIRS BUREAU INVESTIGATIVE REPORT

# CONFIDENTIAL

**IAB #IV 2558097**

# TABLE OF CONTENTS

**Table of Contents**

IV 2558097

**AUDIO VIDEO TRACKING SHEET****PERSONNEL INVESTIGATION FORM****INVESTIGATIVE SUMMARY****INTERVIEW TRANSCRIPTS**

1-Complainant Max Huntsman

**EXHIBITS**

- A** County Policy of Equity Report/Notification Form, ICMS #2022-112213
- B** Policy of Equality (POE) Report/Notification Form, #22-045.
- C** One (1) CD containing recordings of Subject Villanueva conducting interviews on Facebook live, and KFI Radio show; Tweets; email to the Sheriff Department Employees; and two articles from the Los Angeles Times.

**MISCELLANEOUS DOCUMENTS**

- Request for IAB Investigation Memorandum from Commander Jason P. Wolak to Captain Ron Kopperud, dated June 27, 2022.
- Subject of Administrative Investigation Notification Form signed by Subject Alex Villanueva, dated June 29, 2022.
- Manual of Policy and Procedures:
  - 3-01/121.10: Policy of Equality - Discrimination
  - 3-01/121.20: Policy of Equality - Harassment (Other than Sexual)
  - 3-01/121.25: Policy of Equality - Third Party Harassment
  - 3-01/121.30: Policy of Equality - Inappropriate Conduct Toward Others

IV 2558097

# AUDIO/VIDEO TRACKING SHEET

CONFIDENTIAL

COLA002038

EXHIBIT 38 - Page 595

## INTERNAL AFFAIRS BUREAU - Audio/Video Tracking Sheet -

**# IV 2558097**

**Investigator's Name:** Lieutenant Ann Devane

**Total number of USB Flash Drives:** 0

**Total number of compact discs:** 2

**Total number of digital audio files:** 1

### DIGITAL AUDIO FILES

Name
1-Complainant Max Huntsman

### DIGITAL MEDIA

<b>Transcripts</b>	One (1) Compact Disc containing: Audio recorded interview and interview transcript
<b>Exhibit C</b>	One (1) CD containing recordings of Subject Villanueva conducting interviews on Facebook live, and KFI Radio show; Tweets; email to the Sheriff Department Employees; and two articles from the Los Angeles Times.

# PERSONNEL INVESTIGATION FORM

CONFIDENTIAL

COLA002040

EXHIBIT 38 - Page 597

EXHIBIT 38 - Page 598



# INVESTIGATIVE SUMMARY

CONFIDENTIAL

COLA002042

EXHIBIT 38 - Page 599

**CONFIDENTIAL****May 19, 2023**

TO: EDUARDO MONTELONGO,  
ASSISTANT LOS ANGELES COUNTY COUNSEL

FROM: SANDERS ROBERTS LLP

**INVESTIGATION REPORT – FORMER SHERIFF ALEX VILLANUEVA / MAX HUNTSMAN****1. INTRODUCTION**

County Counsel retained the law firm of Sanders Roberts LLP (“Sanders Roberts”) to conduct an independent investigation into complaints against Sheriff Alex Villanueva related to his use of Inspector General, Max Huntsman’s former first name, “Max-Gustaf,” as well as Sheriff Villanueva’s accusation that Mr. Huntsman is a Holocaust denier. Sanders Roberts conducted that investigation via witness interviews and a review of relevant documents and audio broadcasts. This report details the investigation’s factual findings.

**2. ALLEGATIONS**

The allegations that form the basis of the complaints against Sheriff Alex Villanueva are as follows:

**ALLEGATION 1:** In various public appearances on Facebook Live, KFI Radio, and on Twitter, Sheriff Alex Villanueva subjected Inspector General, Max Huntsman, to harassment on the basis of race/ethnicity/ancestry/national origin.

**3. APPLICABLE POLICIES AND GUIDELINES****Los Angeles County Board of Supervisors Board Policy, Chapter 9 – Personnel - 9.015 - County Policy of Equity**

**THE POLICY.** All County of Los Angeles (County) employees are required to conduct themselves in accordance with the entirety of this County Policy of Equity (Policy), and all applicable local, county, state, and federal laws.

**PURPOSE.** This Policy is intended to preserve the dignity and professionalism of the workplace as well as protect the right of employees to be free from discrimination, unlawful harassment, retaliation and inappropriate conduct toward others based on a protected status. Discrimination, unlawful harassment, retaliation and inappropriate conduct toward others based on a protected status, are contrary to the values of the County. The County will not tolerate unlawful discrimination on the basis of sex, race, color, ancestry, religion, national origin, ethnicity, age (40 and over), disability, sexual orientation, marital status, medical condition or any other protected characteristic protected by state or federal employment law, nor will it tolerate unlawful harassment, or retaliation. As a preventive measure, the County also will not tolerate inappropriate conduct toward others based on a protected status even if the conduct does not

Investigation Report  
Sheriff Alex Villanueva  
Date: May 19, 2023  
Page 2 of 8

meet the legal definition of discrimination or unlawful harassment. All County employees are responsible for conducting themselves in accordance with this Policy and its associated Procedures. Violation of the Policy and/or Procedures will lead to prompt and appropriate administrative action including, but not limited to, counseling, training, written warning, written reprimand, suspension, demotion, or discharge.

**COUNTY POLICY OF EQUITY PROHIBITED CONDUCT.** Each County employee is responsible for understanding and abiding by these definitions of prohibited conduct as they may impact any administrative process/proceeding for potential violations of this Policy and/or associated Procedures.

**COUNTY POLICY OF EQUITY UNLAWFUL HARASSMENT (OTHER THAN SEXUAL).** Unlawful harassment of an individual because of the individual's race, color, ancestry, religion, national origin, ethnicity, age, disability, sexual orientation, marital status, medical condition or any other protected characteristic protected by state or federal employment law is also discrimination and prohibited. Unlawful harassment is conduct which has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, offensive, or abusive work environment.

**Los Angeles County Board of Supervisors Board Policy, Chapter 9 – Personnel - 9.020 - Employee Accountability<sup>1</sup>**

“Each Department Head shall:

- Hold their employees accountable for actions that include being dishonest, untruthful, and/or which demonstrate a lack of integrity, consistent with Countywide requirements established by the Board of Supervisors, Director of Personnel, Chief Executive Officer, and Auditor Controller, County Code, Civil Service Rules, and departmental policies;
- Hold their employees, including those working in public safety, patient care, judicial affairs, and those holding fiduciary responsibilities, to high standards of honesty and conduct, which are of essential value to public servants;
- Act affirmatively to abate or prevent performance problems and document those problems when they occur;
- Ensure accountability as set forth in the Los Angeles County Charter, Civil Service Rules, and Countywide and departmental policies;
- Take timely and effective corrective action, commensurate with the offense, which may include remedial measures such as counseling or more formal action such as discipline up to and including discharge from County service; and;
- Retain employees in County service on the basis of the adequacy of their performance, correct inadequate performance, and separate from County service employees whose inadequate performance cannot be corrected.

Failure of an employee to perform their assigned duties so as to meet fully explicitly stated or implied standards of performance may constitute adequate grounds for discharge, reduction, or suspension. Where appropriate, such grounds may include, but are not limited to, qualitative as well as quantitative elements of performance, such as failure to exercise sound judgment, failure to report information accurately and completely, failure to deal effectively with the public, and failure to make productive use of human, financial and other assigned resources. Grounds for discharge, reduction, or suspension may also include

---

<sup>1</sup> The Los Angeles County BOS Board Policy, Chapter 9 – Personnel - 9.020 - Employee Accountability can be accessed at [https://library.municode.com/ca/la\\_county\\_-\\_bos/codes/board\\_policy?nodeId=CH9PE\\_9.020EMAC](https://library.municode.com/ca/la_county_-_bos/codes/board_policy?nodeId=CH9PE_9.020EMAC).

Investigation Report  
Sheriff Alex Villanueva  
Date: May 19, 2023  
Page 3 of 8

any behavior or pattern of behavior which negatively affects an employee's productivity, or which is unbecoming a county employee; or any behavior or condition which impairs an employee's qualifications for their position or for continued county employment."

#### 4. PROCEDURE

At the beginning of each interview, the interviewer advised each witness of the following: 1. That the witness's role is to tell the truth and reveal all relevant facts to the investigator; 2. That the witness should maintain confidentiality of the investigation; 3. That the witness must report any retaliation to the investigator; and 4. That the witness must not retaliate against any participant. The investigator then asked each witness whether s/he had any procedural questions.

To determine the merits of the allegations against former Sheriff Villanueva, the investigator interviewed the following persons:

NAME	DATES OF INTERVIEW	POSITION
Max Huntsman	07/21/22	Inspector General
Sheriff Alex Villanueva	N/A <sup>2</sup>	Los Angeles County Sheriff

#### 5. INVESTIGATIVE INTERVIEW SUMMARIES

##### Max Huntsman

On July 21, 2022, investigator Christine Diaz Herrera, Esq. interviewed Inspector General Max Huntsman via Teams videoconference. Mr. Huntsman did not have a representative present. Initially, Mr. Huntsman made clear that he is not a Sheriff's Department employee and would not feel constrained to keep the contents of his conversation with Ms. Diaz Herrera confidential, should he feel that his work required divulging them.

##### Background

Mr. Huntsman has been employed by the County of Los Angeles since 1991. He has been Inspector General ("IG") since "late 2013 or early 2014," depending on how the official start date is calculated. He currently reports to Executive Officer, Celia Zavala "for administrative purposes," but he is special counsel to the Board of Supervisors ("BOS"), so he reports to the BOS "for substantive matters." His duties as IG are set forth by statute and ordinance. His office monitors the Sheriff's Department to ensure there is no corruption and to ensure compliance with reporting requirements and public accountability. Over time, Mr. Huntsman's office has expanded to oversee the probation department and some Department of Public Health skilled nursing facilities. However, primarily, his

<sup>2</sup> The investigators sought repeatedly to schedule an interview with Sheriff Villanueva. Sheriff Villanueva repeatedly ignored such scheduling requests, but ultimately agreed to sit for an interview on the condition that he be provided the investigator's questions ahead of time. The investigator declined that request and accordingly completed this investigation without an interview of Sheriff Villanueva.

Investigation Report  
Sheriff Alex Villanueva  
Date: May 19, 2023  
Page 4 of 8

oversight focuses on the Sheriff's Department and jails within the County. The work involves monitoring, inspection, and investigation.

Mr. Huntsman described the IG's role as being primarily to monitor the Sheriff's Department's investigations to provide a "second opinion and quality control," rather than being the primary or initial investigator of incidents. The IG's investigative tools include power to subpoena and statutory directives to the Sheriff's Department to provide information upon request by the IG or otherwise cooperate with the investigations. Mr. Huntsman said that the Sheriff's Department routinely obstructs his investigations. It does so by refusing to comply with subpoenas and refusing to provide information that the IG requests.

#### Conflicts With Sheriff Villanueva

Mr. Huntsman's office includes "about thirty people." They interact with the Sheriff's Department on a variety of matters on a daily basis. Some of those interactions are "smooth and routine," while "others aren't." For example, most of the day-to-day interactions involving access to jails for routine investigative and oversight purposes are routine and polite. However, when it comes to obtaining "actual evidence," the Sheriff's Department routinely blocks the IG's office's efforts. Mr. Huntsman has no direct interaction with Sheriff Villanueva or Undersheriff Tim Murakami.

Mr. Huntsman reported that he has not communicated directly with Sheriff Villanueva since 2019. He said that in 2019, the County had sued Sheriff Villanueva related to the Sheriff's efforts to rehire several formerly-terminated deputies, including Caren Mandoyan. Mr. Huntsman said that his office tried to investigate those efforts as well as the related "truth and reconciliation committee" Sheriff Villanueva sought to establish. The IG's Office investigated and wrote a report about those issues and provided a draft to the Sheriff's Department. In response the Sheriff's Department turned off the IG's access to the Sheriff's Department's computer systems. Mr. Huntsman said that several people in the County asked him to meet with Sheriff Villanueva to try to convince him to restore the IG's Office's computer access.

During the June 17, 2019 meeting with Sheriff Villanueva, the Sheriff said that Mr. Huntsman was "a political hack" and said the IG's draft report was wrong and ridiculous and that the Sheriff's intention to rehire Caren Mandoyan was legal. Mr. Huntsman described Sheriff Villanueva as having told him that if he issued the report, it would impact the then-ongoing civil litigation related to Caren Mandoyan. He said that Sheriff Villanueva told him, in a "significant way" that if he issued the report, there "would be consequences." Mr. Huntsman credibly described this as a threat from Sheriff Villanueva.

Shortly thereafter, Sheriff Villanueva announced on a podcast that Mr. Huntsman was under criminal investigation. This was contrary to best practices, pursuant to which one would typically keep a criminal investigation secret from the subject of that investigation. Mr. Huntsman said that Sheriff Villanueva's announcement was more consistent with an effort to intimidate him, which he believes amounts to a violation of Penal Code s. 518, Extortion of a Public Official. Mr. Huntsman said that since then, Sheriff Villanueva has attempted to intimidate others from conducting oversight in other matters and contexts. Mr. Huntsman said that the Sheriff "kept [the purported investigation] over [Mr. Huntsman's] head for years" until the Sheriff's Department eventually said that it had turned its investigative files over to the Attorney General's Office and the Sheriff's former Chief of Staff, Larry Del Mese, testified that the investigation had not actually uncovered any criminal wrongdoing.

Investigation Report  
Sheriff Alex Villanueva  
Date: May 19, 2023  
Page 5 of 8

Subsequently, Mr. Huntsman and the Sheriff's Department have "clashed" in various settings, including before the BOS and the Civilian Oversight Board. One example Mr. Huntsman provided was when the Sheriff told the Civilian Oversight Board that Mr. Huntsman was wrong when he reported that the Sheriff's Department was failing to provide evidence in response to the IG's requests. Mr. Huntsman said he responded by providing evidence supporting his allegation that the Sheriff's Department was withholding documents.

#### Sheriff Villanueva's Alleged Harassment

Mr. Huntsman said that Sheriff Villanueva repeatedly refers to people in ways that are intended to "dog whistle" to his base of extremist supporters to "let them know who their current target is." Mr. Huntsman said that he believes that Sheriff Villanueva refers to him as "Max-Gustaf" (or "Max-Gustav") in order to signal to his extremist base that Mr. Huntsman is "a foreigner...German or Jewish or both." However, Mr. Huntsman noted that after Sheriff Villanueva accused him of being a Holocaust denier (see below), it became clear that he was not intending to signal that Mr. Huntsman was Jewish. Mr. Huntsman said he believed that his German background made him "an easy target." He said that Sheriff Villanueva "likes to target a lot of people" and uses a small group of people he referred to as Sheriff Villanueva's "dirty tricks squad" to gather information about them that he can use to discredit them and have his extremist base target them. He said the Sheriff "collects dirt on his political opponents and then tries to figure out a way to hurt them he turns most easily to race-based techniques because it plays with the people he's trying to curry favor with and he uses whatever means are available to him to do that."

Mr. Huntsman described the Sheriff's "dirty tricks squad" as a group of "a half-dozen or so" people, including a deputy named Mark Lillienfeld that Sheriff Villanueva rehired after he had been caught bringing contraband to a County jail inmate. Mr. Huntsman said he believes Sheriff Villanueva hired Lillienfeld because Mr. Lillienfeld was willing to "do whatever [the Sheriff] asks him to do." Mr. Huntsman said the "dirty tricks squad" also includes a "computer guy" who some people believe places listening devices in offices and "sweeps emails." Mr. Huntsman said he does not necessarily believe that the Sheriff's "dirty tricks squad" hacks emails or places "bugs" in offices, but some people do believe that.

#### Mr. Huntsman's Name

Mr. Huntsman was born Max-Gustaf Edler. His father had been born in Germany and left after World War II. Mr. Huntsman was born after his father had made his way through Canada to San Francisco. He named Mr. Huntsman "Max-Gustaf" after two uncles. The spelling of "Gustaf" with a "f" is the Swedish spelling of the name and just happens to be how the uncle Mr. Huntsman was named after spelled his name. Mr. Huntsman describes his father as having had "problems with drugs," not working, committing crimes, and eventually leaving the U.S., moving to Switzerland, and starting a new family. Mr. Huntsman believes that his father's problems stemmed from having grown up in Nazi Germany and therefore Mr. Huntsman has "no love for Nazi Germany...in fact, quite the opposite" and does not at all deny that the Holocaust occurred.

When Mr. Huntsman was a child, he wanted to change his last name, but his mother would not let him. Eventually, during law school, he was able to have his last name changed from Edler to Huntsman. He said that during all of that time, he did not go by "Max-Gustaf" but rather by "Max." His official name in some places was listed as "Max-Gustaf" but he ultimately was able to have it officially changed to "Max." He said that the State Bar still has a record of him as "Max-Gustaf" and in an old County computer record, he is listed as "Max Gustaf" but he is officially, professionally, and socially "Max." He

Investigation Report  
Sheriff Alex Villanueva  
Date: May 19, 2023  
Page 6 of 8

said that “nobody [who knows him] would ever tell you ‘that guy is Max-Gustaf.’” After Sheriff Villanueva raised the name “Max-Gustaf” Mr. Huntsman took steps to correct the State Bar’s record to “Max” from “Max-Gustaf.” Mr. Huntsman said that there is no fraud or effort to conceal anything by changing his name, but he just does not want to be associated with a culture that he does not feel that he is a part of.

#### Sheriff Villanueva’s References to “Max-Gustaf”

Mr. Huntsman became aware of Sheriff Villanueva referring to him as “Max-Gustaf” from a KFI radio broadcast. He said that the upshot of Sheriff Villanueva’s radio remarks was to purport to wonder why Mr. Huntsman had changed his name and to intimate that “someone should look into that.” He said that he initially thought that Sheriff Villanueva’s reference to his former name was an effort to imply that he was Jewish in order to “dog whistle” to his extremist supporters. However, he said that he has come to believe that the reference was to more generally cast him as an “other” or a “foreigner.” He said that in hindsight he believes that the Sheriff was using the former name in order to set up the allegation that Mr. Huntsman is a Holocaust denier.

#### Holocaust Denier Allegation

Sheriff Villanueva eventually told the Los Angeles Times editorial board that Mr. Huntsman is a Holocaust denier. Mr. Huntsman said he believes that this information came from Adam Loew. Mr. Loew is the husband of a former Metro employee who sends frequent emails to many people in the County alleging widespread corruption that ultimately led to his wife being terminated. Mr. Huntsman is one of the people to whom Mr. Loew sends his frequent emails. Mr. Huntsman believes that Mr. Loew and Sheriff Villanueva became allies because they both dislike and oppose County Supervisor Sheila Kuehl. Mr. Huntsman said that Mr. Loew was the first person he saw referring to him as “Max-Gustaf.” When Sheriff Villanueva started using the name, it “rang a bell” because he recalled Mr. Loew having used it.

Mr. Huntsman said that he has never been a Holocaust denier and has no idea what could have given anyone the idea that he was.

When Sheriff Villanueva accused Mr. Huntsman of being a Holocaust denier, there were news stories about it. Mr. Huntsman received communications and messages from friends and acquaintances, in particular from Jewish friends and acquaintances, expressing sympathy for his having to endure such an allegation. He said that he otherwise did not receive any negative feedback or harassment as a result of Sheriff Villanueva’s allegation. Mr. Huntsman sent an email to the BOS in response to Sheriff Villanueva’s allegation that he was a Holocaust denier. He also filed a CPOE complaint based on his belief that the Policy of Equity required him to do so.

#### Veronica Pawlowski

On August 1, 2022, attorney Christine Diaz-Herrera interviewed Justice Deputy, Veronica Pawlowski via Teams video conference. Ms. Pawlowski did not have a representative present.

#### Background

Veronica Pawlowski has worked for the County of Los Angeles since 2012. She served as Supervisor Sheila Kuehl’s Justice Deputy for two and a half years. Previously she held the position of Special Counsel to the Board of Supervisors on Child Welfare issues. Subsequent to that, she held a



Investigation Report  
Sheriff Alex Villanueva  
Date: May 19, 2023  
Page 7 of 8

position at County Counsel where she advised the Department of Children and Family Services; the Probation Department; and the Los Angeles Homeless Services Authority. Pawlowski has been an attorney for 19 years. She received her B.A. in Political Science and Communications from USC in 1997 and her law degree from Boston College in 2000.

While she worked at County Counsel, Ms. Pawlowski worked on ordinances that give bodies of oversight their authority. She was really aware about how that relationship is supposed to work. The Supervisor saw Ms. Pawlowski as a subject matter expert on ordinances because she knew them better than anyone else.

#### Interaction with Sheriff's Department

Most of Ms. Pawlowski's interactions with the Los Angeles County Sheriff's Department ("Sheriff's Department") is at the Assistant Sheriff level. Her work with the Sheriff's Department has been very focused on the jails. Supervisor Sheila Kuehl ("Supervisor Kuehl") called for closure of a main jail in Los Angeles County. Much of Ms. Pawlowski's work has been focused on this issue. Ms. Pawlowski has dedicated a lot of time to learning how the jail operates. The Sheriff's Department has a board liaison and a board liaison team. This team advises Supervisor Kuehl's office of critical incidents.

#### Sheriff's Alex Villanueva's Facebook Live Sessions

Part of Ms. Pawlowski's responsibilities on behalf of her bosses is to sit in on meetings and keep them informed about what is going on in her portfolio. Ms. Pawlowski started to listen to Sheriff Villanueva's Facebook live sessions to alert her bosses if he said anything newsworthy. Ms. Pawlowski could not recall how many Sheriff Villanueva Facebook live sessions she has listened to. She has listened to them both live and via a recorded session. Ms. Pawlowski has listened to "just about every session" since Sheriff Villanueva started doing them.

In the beginning it was just Ms. Pawlowski listening and taking notes. Somewhere along way, she started to receive summaries of the sessions from the CEO's office, Countywide Communications Unit. Ms. Pawlowski did not know who sent them because she would receive them from Supervisor Kuehl's Communications Deputy. Lenny McGuire is in charge.

#### Max Huntsman

Ms. Pawlowski reported that Sheriff Villanueva made comments about IG Max Huntsman, "nonstop." Sheriff Villanueva called him "Gustav Hunstman," alluding that he is "some kind of Nazi." She said that Sheriff Villanueva has made his comments in writing. Ms. Pawlowski believes Sheriff Villanueva referenced it in a letter and does not hide it. Sheriff Villanueva referred to Mr. Huntsman and said his real name was "Gustav." Ms. Pawlowski believed Sheriff Villanueva's comments were intended to be about Mr. Huntsman's national origin.

#### KFI Radio Talk Show

Ms. Pawlowski reported that Sheriff Villanueva also made comments about the Justice Deputies on the radio station, KFI. Ms. Pawlowski said everything blended together. She listened to his comments in the different forums giving him space. She could not distinguish one from the other. They listened to all of his comments across various media platforms. Ms. Pawlowski believed some of it was captured and could be located by Lenny McGuire.



Investigation Report  
Sheriff Alex Villanueva  
Date: May 19, 2023  
Page 8 of 8

## **6. DOCUMENTARY EVIDENCE**

- a. October 21, 2021 Tweet from @LACoSheriff\_33;**
- b. March 22, 2022 Tweet from @LACoSheriff\_33;**
- c. March 16, 2022 Facebook Live recording;**
- d. March 29, 2022 Facebook Live recording;**
- e. April 26, 2022 Facebook Live recording;**
- f. July 13, 2022 Facebook Live recording;**
- g. October 26, 2022 Facebook Live recording;**
- h. March 5, 2022 Email From Sheriff Villanueva titled "Message From the Sheriff: Transparency and Accountability";**
- i. March 6, 2022 KFI Radio Show recording;**
- j. April 1, 2022 Los Angeles Times Editorial titled "Editorial: The Villanueva Saga Just Gets Odder and More Destructive";**
- k. April 1, 2022 Los Angeles Times article by Alene Tchekmedyian titled: "Sheriff Villanueva Makes Ugly, Unfounded Claim Against County Watchdog."**

# **INTERVIEW TRANSCRIPTS AND AUDIOS**

**CONFIDENTIAL**

**COLA002051**

EXHIBIT 38 - Page 608

**IV 2558097  
AUDIOS AND  
TRANSCRIPTS**

# COMPLAINANT INTERVIEW

CONFIDENTIAL

COLA002053

EXHIBIT 38 - Page 610

**REFER TO INTERVIEW TRANSCRIPTS AND AUDIO CD**

**1. COMPLAINANT MAX HUNTSMAN**

**CONFIDENTIAL**

**COLA002054**

**EXHIBIT 38 - Page 611**



**IV 2558097**

**WITNESS INTERVIEW**

**INSPECTOR GENERAL MAX HUNTSMAN**

**Herrera:** I am an attorney with Sanders Roberts. We have been hired by the county to conduct this independent investigation. The county, because they don't- apparently the Sheriff's Department doesn't know how to use these Teams videos, I'm also going to record via audio on another device. Just letting you know that. 'Cause apparently they haven't figured out- they haven't figured out how to incorporate speech.

**Huntsman:** Why would you be interested in what the Sheriff's Department can do? They have CPOE investigators who have interviewed me and I thought this was an external investigation because the county was not pleased with how the Sheriff's Department was handling it. Is that not correct?

**Herrera:** I think the idea, and I'm sure you're familiar with how the CPOE process is, but typically there's an intake and an assessment done and then depending on, you know, the results of the intake and assessment, you know, it's farmed out to different people to do investigations. In this case, because of the nature of the allegations, I think also the subject of the investigation itself, I think the Sheriff's Department decided that it made more sense, and the county, to have an external, a neutral third party, to conduct this.

**Huntsman:** I hear what you're saying and that's true as to all CPOE investigations except the Sheriff's Department ones. And I was actually contacted by a Sheriff's Department investigator. I wasn't told that it was an Intake decision and then the sheriff, in the link I sent you, he told the Times Editorial Board that I had made a CPOE complaint against him. So I'm pretty sure that they had triggered some process internally that he was informed of. And so I'm just- Look, it doesn't matter. I'm very skeptical about this whole process.

**Herrera:** I'll certainly ask you some questions about that to get a better sense of who you spoke to and I can look into that. So again, for the record, my name is Christine Diaz Herrera. Can you say your name for the record?

**Huntsman:** Max Huntsman.

**IAB IV 2558097**

**Page 1 of 37**

**MAX HUNTSMAN**

**Herrera:** Perfect. And today is July 21<sup>st</sup> 2022. It's 2:05 PM. I have an admonition that I'd like to read. So my admonition states that "You are about to be questioned as a part of an official Los Angeles County Sheriff's Department administrative investigation. You are here as a witness in a matter which concerns another employee, the complainant. You obviously, as you know, are not a subject of the investigation itself and you are not under investigation at this time. I think the question that they typically ask is whether you're aware of the Policy and Ethics chapter of the Manual of Policy and Procedures, and this might be different because you're not actually within the Sheriff's Department.

**Huntsman:** Right. The admonition doesn't quite make any sense, but I note the admonition.

**Herrera:** Right, and, you know, essentially the other piece of it is just that this is a confidential interview and we ask that you keep the contents of- the substance of what we talk about today confidential but certainly that you've talked to me or that this investigation exists is not a secret and, you know, to the extent that you share it with someone else, that's certainly your purview.

**Huntsman:** I'm not part of the Sheriff's Department.

**Herrera:** Correct, I am aware of that.

**Huntsman:** So if you're conducting an internal sheriff's investigation, already I was contacted by the Sheriff's Department. I was told it was confidential and then the sheriff told the LA Times about it. So I don't personally hold any stake in the confidentiality of the sheriff's process. I'm not questioning you or what you're assigned to do, but as soon as you provide this to the sheriff, he will do whatever he thinks is best politically with it and that's how it is. So I'm not going to agree that I won't talk about this with whomever I feel like and including County Counsel, including Esther Lim, including all the other folks who I think it might be appropriate in order to protect the rights of the individuals who he's been targeting.

**Herrera:** Sure, and I will say that my work is at the direction of County Counsel and because he is the subject, it wouldn't be him that I'm reporting to and it wouldn't be him that I would be actually giving the final report to, but in any event, I do understand.

**Huntsman:** Okay that's fine. The reason my tone has changed is because you read me a Sheriff's Department internal investigation admonition. If you're telling me that you work for County Counsel and this is going to County

IAB IV 2558097

Page 2 of 37

MAX HUNTSMAN

Counsel, then I apologize for my tone. It's the Sheriff's Department and their conduct that I take issue with. So if County Counsel just said, 'Hey look, because this is going to go to the sheriff, read this admonition', I understand that and I have no beef with County Counsel. My concern is with the conduct within the Sheriff's Department. Once County Counsel's done with their investigation, if they then make a determination of what they have to tell the sheriff, I don't have any problem with that. I thought this was being conducted by the sheriff, in which case I have a different opinion.

**Herrera:** And that's a fair point, and again, in terms of process, all I can tell you is that, you know, they gave me all of the things that they normally would use because I'm standing in their shoes, so to speak. In some ways that this would normally be done, typically by somebody within the Sheriff's Department.

**Huntsman:** My statement to the Sheriff's Department wasn't given to you?

**Herrera:** [inaudible] it's not.

**Huntsman:** Okay. Because County Counsel has asked you to do this. The Sheriff's Department didn't, okay got it. So you don't- When you get to the questions I'll talk to you about that.

**Herrera:** Okay, fair enough. That's what I'm saying. So, you know, I apologize. It sounds like there's some pieces of information out there that I may not have yet--

**Huntsman:** No no, it's okay.

**Herrera:** --but certainly I will make every effort to make sure that I do get that information. I typically just start with a little bit of background information. So, you know, how long have you worked with the County of Los Angeles?

**Huntsman:** Since 1991.

**Herrera:** And what is your current position?

**Huntsman:** Inspector General.

**Herrera:** And how long have you been in that position?

IAB IV 2558097

Page 3 of 37

MAX HUNTSMAN



**Huntsman:** Well I was hired in 2013, and the post was sort of officially anointed in 2014. So, depends on how you look at it, but it was late 2013 or early 2014.

**Herrera:** Correct. And, who do you report to?

**Huntsman:** Technically I report to the Executive Officer, Celia Zavala. I have an odd status in that I'm Special Counsel to the Board of Supervisors, so she supervises me primarily for administrative purposes and I report to them for substantive matters.

**Herrera:** And when you say you report to them, you mean you report to the Board of Supervisors?

**Huntsman:** My reports go to the Board of Supervisors. I'm, in addition to County Counsel, I'm the other lawyer for them in the county and so I give them legal opinions from time to time. I interact with them. So I have a kind of a weird status, but technically I'm part of the Executive Office and my boss is Celia Zavala.

**Herrera:** And what are your duties typically? I know that's a broad question, but--

**Huntsman:** It's a broad question. There's an ordinance that sets forth many of my duties and there are California statutes that set forth my duties. I'm a county officer and so my duties are set forth by statute and ordinance. The short version of them is that, my office was created to monitor, at first the Sheriff's Department, to make sure that we didn't have corruption within the Sheriff's Department of various sorts and to make sure that there were public reports, transparency, accountability for sheriffs' conduct to protect constitutional rights of prisoners and the public in general and so that's how we were created. Over the years we've had our responsibility expanded a bit, to include the Probation Department; we are actively responsible for- at one point we did some work on skilled nursing facilities that involve the Department of Public Health. So our mandate is a little broader under 25.303 of the Government Code. We can advise the sheriff- the supervisors on matters other than the sheriff because they have a duty to supervise all county officers, and we do that from time to time, but it's primarily Sheriff's and Probation, including the jails. We also have responsibility for all the different county and noncounty folks that have any kind of impact on the jails and our work is partly evaluative in terms of reports on procedures and practices, partly investigative. In our earliest days we were less investigative. Our duties were expanded, first by ordinance and then ultimately to some degree by statute.

**Herrera:** Do you have any oversight with regards to, like, use-of-force issues that come up within the Sheriff's Department?

**Huntsman:** Oh yeah, absolutely. Our staff role out to all officer-involved shootings and we are supposed to be able to monitor and actively investigate those instances by law, but the Sheriff's Department does not permit us to properly do it. What they do permit is for us to come on scene for a shooting, get a walk-through -sometimes a partial walk-through- of the scene and some basic information about what's happened. They usually don't cooperate with our investigations after that. So for instance there was a guy who was arrested in a- Allegedly there had been a kidnapping and so they had done sort of an aggressive attempt to arrest him with other people in the car, that had endangered their lives. We asked for the reports relating to the kidnaping. It was the justification for what they did; they refused to give it to us. So there's a disconnect between what our job is under statute and ordinance and what the Sheriff's Department obstructs or does not obstruct. But we do go out to the scenes.

We do a similar thing for in-custody deaths, on a case-by-case basis. So in some instances where there's in-custody deaths or even uses of force, Category 3 -the more serious uses of force- then we sometimes go to the scene again to see the scene, to look at it, but sometimes we don't. Because there are instances where that's not really helpful based on the way things operate in Custody, when we gather any information, so. So we do do that too. And yeah, as to use of force in general, part of our duties are to review.. not on a case-by-case basis but overall, the use of force and the way they're handling policies. We are permitted to do individual investigations but we're not required to.

**Herrera:** What about if someone was injured while in custody? Is that type of allegation, is that something you would look into?

**Huntsman:** Yeah. Again, the way our mandate is worded, we are responsible for monitoring and sometimes investigation matters in Custody, which includes what you describe, as well as many other issues. Any kind of things having to do with the terms of confinement and the manner in which people are held, any complaints they have. So we get complaints directly from people, we go and talk to them, we conduct inspections of the jails as well as limited investigation as to individual incidents. The Sheriff's Department has primary responsibility and our primary model is that we prefer to monitor the Sheriff's Department's investigations. But we are lawfully entitled to conduct a follow-up investigation. So for instance, we have recently in our investigation in assisting the Attorney General's Office have done some onsite interviews and reviews and

taken photographs and whatnot. So I recently was down at the East LA Station and took a photograph of a 3%er logo that has been discussed recently and has been a matter of- I think will be a matter of public concern but has been a matter of concern within the county. So that's kind of how we function. We don't investigate every case. We're not ever the first level of investigation. We're meant to be sort of a second opinion and quality control.

**Herrera:** Have you had any role in- Let me back up. Are you aware of there being an incident where there was someone who was injured while in custody, allegedly by an officer putting his knee on their neck where they couldn't breathe?

**Huntsman:** Oh yes.

**Herrera:** Okay.

**Huntsman:** I'm very much aware of incidents like that. I don't know about the 'couldn't breathe' part.

**Herrera:** That they put the knee on the neck. And that they--

**Huntsman:** Yeah. I think the one that has gotten a lot of attention of late is the Escalante incident. Escalante was the person who got the thing done to them and Deputy Johnson was involved in it, and I'm very much aware of that incident.

**Herrera:** And is that an incident that you are investigating separately or looking into or, or you just monitor it?

**Huntsman:** We are attempting to investigate it; however, the Sheriff's Department has been obstructing our investigation.

**Herrera:** And how do they do that? How do they obstruct?

**Huntsman:** Well the tools that we have for investigating are two parts: one is an ordinance, and statutes, that require the cooperation of the Sheriff's Department. The other part is subpoena power, which is also according to both ordinance and statute. And so when it comes to the subpoenas that we issue, the Sheriff's Department does not comply with them, and that's how they obstruct. When it comes to the other part of our ordinance, which is supposed to be self-executing, which is that we have the authority to require any county department and any Sheriff's Department employee to provide information to us upon request in the manner that we directed, they simply refuse. And that's done at the

**IAB IV 2558097**

**Page 6 of 37**

**MAX HUNTSMAN**

direction of the sheriff and then, of course, as- we're talking here because of more active efforts the sheriff has taken to obstruct my investigations that began when he first took office and we started to report on his rehiring of a deputy, a law enforcement gang member, Caren Mandoyan, and when we reported on that then he started to take some actions against me: placed me under criminal investigation and the subject of my information I provided to CPOE related to another effort on his part to attack and discredit me, which I believe was for the purpose of obstructing our investigations into his misconduct and law enforcement gangs. But when I was talking about them obstructing our direct investigations, I was referring more to the fact that they refuse to comply with subpoenas and refuse to comply with information requests except on limited bases.

**Herrera:** Now is that something that you can compel them to do so in court or is that something--

**Huntsman:** Yes. The subpoenas have a built-in mechanism and we have- So the sheriff was initially subpoenaed to speak about law enforcement gangs. He refused to talk. The county took the action permitted for in the statutes, certified the matter with contempt proceedings to the court. The court told the sheriff that he could not ignore our subpoenas and then he showed up. He then refused to take the oath and so we had to go back to court and get him compelled to take the oath. So then he took the oath and swore to tell the truth and we asked him a bunch of questions and he refused to answer many of them. So we have to go back to court to compel him again and we're in the process of preparing that. So there is absolutely a mechanism for compelling the subpoena process, which is a very slow mechanism and the sheriff has I think intentionally made it slow, so it hasn't effectively compelled the behavior even though we've won every time we've gone to court, and the court has followed up with us.

The other mechanism I mentioned, that's the subpoena process. Our inherent authority to direct county employees, as an officer of the county given that authority, the Sheriff's Department also does not comply with that. County Counsel - I think it was last week - filed a petition for a writ of mandate in the Superior Court to compel them to comply with that legal duty and.. which should do a bunch of things. Like, when I first came under criminal investigation, they shut off our access to computers. So if we had that access we wouldn't even have to ask them; we would just type in our code word and we would pull up information on the computers. So that's part of that writ of mandate, to say you need to turn that back on. Body cameras for instance. The whole plan with putting out body cameras was that we would have

**IAB IV 2558097**

**Page 7 of 37**

**MAX HUNTSMAN**

direct access to that video, without having to ask the Sheriff's Department for it and the Sheriff's Department has refused to comply to that. So then that's part of that writ of mandate that will eventually, I suppose, be litigated in court, but it takes a very long time. We have no, you know, direct ability to enforce or to compel since the Sheriff's Department's a stand-alone entity.

You look like you're frozen. Are you there? I think we have technical difficulties, so I don't know what of this you can hear, if any. I'm going to stop talking. [silence 0:18:09 to 0:18:49] Hello, you're moving again.

**Herrera:** Yeah, I could hear you but you couldn't hear me. So I--

**Huntsman:** Yeah, your picture froze in a one position and then I couldn't hear anything from you. So I kept talking for a while--

**Herrera:** It was the whole thing, I got all of- The last thing I heard was that, you know, that the process to access things like body-worn cameras, that there's no direct ability to enforce or compel, so you've been going through that process to get that type of information.

**Huntsman:** Right, apart from the legal process, we don't have any ability to directly do something. The county, everything it does with respect to the Sheriff's Department is controlled by the sheriff. So for instance, Murakami the undersheriff was found by CPOE in the past to have violated CPOE rules and that was submitted to the sheriff and the sheriff said 'I'm not taking any action.' Mandoyan, the county had some ability yet they had to sue him to prevent him from rehiring Mandoyan. So it's not like I can say, 'Hey you're a county employee. If you don't answer my questions you're fired' because the sheriff gets to decide who to fire. So effectively I can do nothing without the sheriff's permission and the sheriff does not choose to give it. It's kind of, like, Watergate where they fired the special prosecutor. Unless the person being investigated agrees to it, they can't be investigated. Unfortunately that's the way it currently is.

**Herrera:** Just an aside, but the Board can't target the money? Like for example, the contractors that, like, the body-worn cameras, like 'I'm not gonna pay unless we have access to it.'

**Huntsman:** That's correct and recently something like that has just happened, which is, has to do with school resource officers. So in that context, the Board directed us to approve or disapprove the contracts in those matters rather than- They would basically delegate it to us, their approval authority. All county contracts are controlled by the Board, but

IAB IV 2558097

Page 8 of 37

MAX HUNTSMAN

the downside is that these are important contracts and the budget point- they could turn off the sheriff's budget, say 'We're gonna defund the police,' as people have sometimes requested, but they don't want to do that because we need police, you know. So unfortunately the mechanisms they have to control the sheriff are all blunt instruments that would have a negative impact upon the public and less of an impact on the sheriff. And so, it's kind of like sanctions in the international arena where if you put sanctions on a county then the people of the country suffer and the leaders sometimes don't, you know. It's that same kind of problem. In theory they ought to have a lot of power and authority, but they- in practice they don't really have a mechanism to force the sheriff. Which is why - I don't know if you followed it, but recently they voted to put on the ballot for the public to consider whether or not they could remove the sheriff by a four-fifths vote for failing to abide by his legal duties as well as obstruction of investigation. So that's kind of a mechanism that, if the voters approve, they would then have the ability to say to the sheriff, 'Look, you're not following the law and so we're going to remove you if you don't follow the law.' Still, politically that's a big pill to swallow.

**Herrera:** Right.

**Huntsman:** So I don't know if they would actually do it because, again, the impact on the public and the perceived impact on the public is very great and so I think they would be loathe to use that mechanism for enforcement purposes. What we really need is, is court-ordered compliance and that will take time. We also have an investigation by the attorney general that could result in court-ordered compliance, which will also take time. So there are mechanisms, but they're all slow.

**Herrera:** That seems to be a theme everywhere, not just here. With regards to your interactions with the sheriff's office, what's the extent to your typical interactions with them? Like, do you.. I know it's a broad question.

**Huntsman:** Well it is a broad question so I'll break it down into different sort of categories. There's me personally; there's my office; and then there's what you mean by the sheriff. So me personally, honestly that's a laugh. My office, which is roughly 30 people, a little less, have a variety of duties and so we have a variety of interactions with the Sheriff's Department. And some of them are smooth and routine and some of them aren't. So on a daily basis I have monitors who go into the jails and inspect the jails, talk to people, do a variety of things. I have inspectors who gather information regarding reports that we're working on; have communications with people at the middle or bottom of the

**IAB IV 2558097**

**Page 9 of 37**

**MAX HUNTSMAN**



Sheriff's Department; I have lawyers who write reports and do analysis who talk to, again, people at the middle or bottom of the Department. And those communications are relatively smooth. Under the current administration, there have been restrictions placed on them so that when we make requests for documents or other things, those have to go up the chain and get approved and they don't get approved, except in cases where they think it's not important. But in all the important cases, such as the incident you're referring to where the man got the knee on his head/neck area, then we don't get anything. So.

But on the day-to-day interactions, there's a fairly polite interaction and that goes for me as well. When I went down to escort the Attorney General's office to do these site visits, we were treated fine. An assistant sheriff was there. He's one who we have a long history of communication with because we're a monitor in the jails under a federal law, see Johnson, having to do with the ADA, and one of my assistants, who has just left to go work in Philadelphia, had a very longstanding good relationship with him. So that was all very smooth. I was able to go in and take the picture that I took of the 3%er logo without any trouble. It's not always quite that smooth, but when it comes to requests for actual evidence in our investigations, that's where we're shut down. So as long as we're polite and we don't cause any trouble, they're polite to us.

And that's my staff, that's me, as to the department in general. As to the sheriff, zero. He sometimes sends letters- his undersheriff sometimes sends letters. They are rarely- they're usually nonsensical, rarely in response directly to what we say. So for instance, in January we requested evidence regarding law enforcement gangs under the new statute, Penal Code 13670, and he didn't respond; Murakami sent us a letter. And he sent a letter to the Board telling me to cease and desist from the use of the term and all these other things. And that's the kind of response we get, or tweets talking about us. The thing that caused me to report to CPOE on this matter was a tweet by him, or a press release by him, attacking me, not communication to me. I haven't talked to the sheriff personally since.. he threatened me back in 2019 and I haven't talked to Murakami. We used to have a little interaction with some of the higher level folks at the Civilian Oversight Commission, but they stopped going, and they're required by ordinance to go to that and they don't do that anymore.

So we don't have any real relationship with the management of the Sheriff's Department at that level. At the assistant sheriff level, [unintelligible] 2630 Patrol and Custody, we have cordial relations. You

know, I can call them or email them and they email me and we communicate just fine.

**Herrera:** You said in 2019 he threatened you?

**Huntsman:** Yeah, that was in June, June 17<sup>th</sup> of 2019. I'd mentioned that we wrote a report about Caren Mandoyan, the grim reaper, who he was trying to rehire. The county had sued him because he was doing that unlawfully, and we set about trying to investigate the manner in which the sheriff was saying he was going to rehire a bunch of fired deputies including Caren Mandoyan -what he called a Truth and Reconciliation Committee or Commission- that he was going to set up within his office. So we tried to investigate that and he refused. We wrote a report about it as best we could with the information we could gather, and I gave him a draft of it, and when I did that he shut off our computer access and I was asked by people in the county to try to convince him to change his mind.

So I met with him personally and said, 'Will you please turn back on our computer access?' and he used the opportunity to tell me that I was a political hack, that my report was ridiculous. I have since learned he never read it. But he said that it was all wrong and that his hiring of Mandoyan was correct and wonderful, and that I shouldn't issue the report, because it might influence the civil litigation regarding rehiring Mandoyan. And I said, 'Look, that's my job as the Inspector General to issue this report and what happens in the civil case isn't my business. I would think it wouldn't have any impact because I think probably it's unlawful, but that's for you to work out. I'm just reporting to the public what happened.' And in that context, he said to me, 'If you issue this report, there'll be consequences,' and he said it in a significant way, but he didn't say what they were and his number two, Mr. Del Mese, who was present, quickly changed the subject. And a short time later, he announced to the press that I was under criminal investigation and sent a letter to the Board asking them to relieve me of duty because of the 'horrible conflict' there was for somebody who is being criminally investigated to be responsible for--

**Herrera:** I'm sorry, you were just a little bit fast. I'm only so good at typing. I was not hired for my typing skills. So you said he announced- what did you say he announced?

**Huntsman:** In a podcast, he told some representative of the media that I was under criminal investigation for stealing from the county, basically, from his department, stealing data, and he had Murakami send a letter to the board asking- saying the same thing and asking that I be removed from office. So he announced it publicly. The reason I point that out is

IAB IV 2558097

Page 11 of 37

MAX HUNTSMAN



because that's not how you begin a criminal investigation. If you're in law enforcement and you think somebody committed a crime, you prefer to conduct an investigation without the target knowing that you're investigating them. The last thing you do is announce publicly, to start, that you're conducting an investigation. But that's exactly what you do when you want to intimidate somebody. And so that's why I believe what he did then was a violation of 518 of the Penal Code: Extortion of a public official through a threat in order to try to get them to not discharge their duty, in this case; he didn't want me to issue that report. And then when I did, he wanted to inflict the consequence. Since then, he has taken a number of actions against people involved in oversight, all of which designed, I believe, to intimidate them in order to suppress investigation of the law enforcement gangs and of his misconduct-alleged misconduct of various kinds, including the Escalante matter, the Kobe Bryant matter, and other instances which we tried to investigate but didn't. So I think it was the beginning of a process that he then developed as a way to prevent, the officials of the county from conducting oversight over him as they're required to do by law. And I go into that detail because I don't think it's a coincidence the thing that I reported here I think was a part of that process.

**Herrera:** Right and I think it's good for context so I appreciate the background information. With regards to that issue, was there any kind of outcome or.. was there any kind of admonition from the Board about his behavior or was there any type of followup?

**Huntsman:** A bunch of things have happened. The Board did respond and say 'No we're not going to remove Huntsman. We agree with you; there's a conflict, but the conflict is for you to investigate Huntsman, especially based on what you are claiming to investigate him on.' What he claimed was my crime was that when he was about to be sheriff, we discovered that the Sheriff's Department had a set of internal documents related to discipline that it kept secret from us, which was in violation of law, and we brought this to their attention and said, 'You need to provide us these hidden files.' We used to have computer access to their discipline records and suddenly we learned that all the runs we'd been making had been inaccurate because some of them, some records just weren't visible. It was as though they never existed. And it was a mechanism used to protect sensitive documents and make them only visible to the people in Internal Affairs. Which wasn't a bad thing; it's just the way- the mechanism they used was bad. So we brought that to their attention. They hemmed and hawed and didn't get around to complying with us, until the sheriff- the current sheriff -won the election. And then pending his election win, he contacted the head of Professional Responsibility - or so has testified Del Mese, his chief of staff, the guy who was there

when he threatened me, has testified that the sheriff directed him to do this - he contacted her and they provided her a settlement agreement for Mandoyan to get his job back. They were trying to get Mandoyan rehired before Sheriff Villanueva took office so that nobody would know that he had done it. And when that happened, the Sheriff's Department changed its mind. Because we had said to them, 'You know, you need to provide us these records, now more than ever that there's a new sheriff coming in. If you were to delete or destroy records, we'd have no way to prove it, but if you give us these records, then we can- we have a copy that we can compare to records in the future.' After that happened - Alicia Ault was the person who got that - she agreed to give it to us. It was approved by the sheriff, I was told. I requested it in writing and we got a copy of discipline records that included the sheriff's discipline records- the current sheriff, Villanueva -and he believes we did that in order to provide them to the Board who could put them into a nifty hit piece, political mailer or do some skullduggery against him. The proof that that didn't happen is the fact that in those discipline records there's proof that things he said about his discipline record are false, and by law the Department can make those public: peace officer bill of rights. The term that's commonly used to refer to Penal Code 832.7, which is actually not part of the peace officer's bill of rights, has restrictions on what can be put out publicly about a law enforcement officer's discipline records, but there's an exception when you yourself give false information.

So he has done that regarding one of his cases and nobody in the press knows about that. And that's because when we got that evidence, we put it on ice, we sealed it, we did not give it to the Board, we didn't give it to anybody. We kept it. We didn't even review it ourselves until much much later after all this happened, but he tried to frame that as a crime and presented it to various folks to try to get them to be interested: the FBI, the AG, and this has all been testified to by Del Mese recently at the Civilian Oversight Commission. So that's--

**Herrera:** What's the last name? I'm sorry.

**Huntsman:** Del Mese?

**Herrera:** Yeah. How do I spell it?

**Huntsman:** Del Mese's last name is spelled D-E-L is one word and then the second word is Mese, M-E-S-E. And he was the sheriff's chief of staff. He was on his transition team and became his chief of staff. He was dismissed from that position maybe a year later, but at the time he was being- when these things were happening, Del Mese was his chief of staff, and

**IAB IV 2558097**

**Page 13 of 37**

**MAX HUNTSMAN**

at the time that the sheriff threatened me in June, Del Mese was still his chief of staff. And Del Mese testified on July 1<sup>st</sup> about some of these facts. So the sheriff put together that criminal case, tried to sell it to the FBI, to the Attorney General, to the DA. Nobody bought. He got a letter from the Civilian Oversight Commission, or Murakami, his number two, did, saying, 'You know it's a conflict for you to investigate the inspector general. You shouldn't be doing that,' and Murakami said, 'You know you're right, we agree. We're going to give it to another agency when we reach an appropriate point of handoff' - this is the term he used. They never did. They kept it over my head for years, and the Board had nothing they could do other than say, 'No we're not going to remove Huntsman' until near the end of last year and the Civilian Oversight Commission got some traction with getting County Counsel to ask the attorney general to step in.

Actually I've got two agencies- it's- No that's right, I'm confusing two things the attorney general did. The first one was opening a civil rights investigation against the sheriff, and that happened oh a year and a half ago or so. And then, more like a half a year ago or so is when the County Counsel sent a letter to the AG saying 'Can you please step in and conduct some oversight over the sheriff, a la your question about, you know, what mechanisms are to enforce stuff. And they addressed a number of things including, a group that he has, called the secret police by some people, that targets his political enemies, and that's part of that process I talked about where he's targeted people who oversee him. That warrant investigation against one of the supervisors and an ally of hers in a nonprofit organization, a bunch of things, and the investigation against me. And the attorney general said, 'Well we'll look into that. We'll take a look at what he's got on Huntsman and see what we think about it and we'll look at that warrant process. But we're not going to, like, take over the Sheriff's Department.

When that happened, the sheriff publicly said, 'Well I've already submitted the case on Huntsman to the attorney general. I did it a couple of months ago. So supposedly - I think it was around November of last year - he had submitted it to them for filing and asked them to prosecute me. I haven't seen those documents 'cause it's all part of the criminal investigation, but if it's what I think it is, it's a violation of my constitutional rights because he doesn't have any probable cause. What I did was provided for in my job description and in writing with the approval of the then-sheriff Jim McDonnell, so. So that's kind of the arc of that. So the answer is yeah, there was a response; it wasn't terribly effective in controlling the sheriff's behavior because he has placed himself above the law, and because the mechanisms for dealing with that are slow. But, it is now before the attorney general. There's some

attorney general in San Diego whose job is to review the filing and decide whether or not he should prosecute me. So I'm still under threat of arrest, but I don't really expect to be arrested since Del Mese has testified that everybody- all the professionals who looked at it said there's no crime here, including the sheriff's internal people. So, you know, it's an elaborate process. I apologize for the long answer, but--

**Herrera:** No that's okay. And I--

**Huntsman:** The complete answer is even longer, so I'm gonna stop there. But yeah, there was a reaction, but it's, you know, it's complex and it hasn't changed the situation completely.

**Herrera:** And so my question is, does that end up dovetailing with the racially biased emails and some of this other stuff? Is that- Do they dovetail together or is it, this happened and then there's a chunk of time where there's not as much going on and--

**Huntsman:** No no, there wasn't a chunk of time. I mean, I haven't gone into all the details regarding all the things the sheriff has done, endlessly since then. But the fact of the matter is, there hasn't been a chunk of empty time. The thing I described happened. He then went to, you know, he runs the sheriff's department, so events happen. We report on things. There's discussions publicly. He has a number of times attacked me in the press, claimed that I am corrupt and that I'm a liar. We had a number of run-ins at the Civilian Oversight Commission. They kept- the sheriff just kept sending his staff there to say, 'When Max tells you that he's not getting cooperation in his investigations, that's not true. We give him everything he asks for.' So I had to present to the Civilian Oversight Commission a series of emails in a PowerPoint - I provided the emails detailing the numerous requests we've made and showing the email responses showing that they never gave it to us. And I had to do that twice. The first time was in a presentation to the Civilian Oversight Commission and then a year later I issued a formal report that's up on my website called Unlawful Conduct At the Sheriff's Department and it details a whole series of our investigations that were thwarted as a result of the failure to provide information.

So the false narrative that he's put out to the public, is that I'm a liar and he still to this day continues to do that. And that's gone on nonstop and it's been supplemented by a tax on other individuals: Sachi Hamai, the former Chief Executive Officer of the county, ran afoul of him because he tried to get money for a PR firm within the sheriff's department and she refused to give that to him and then he targeted her, first claiming that she was refusing to provide sick-time benefits to his deputies if they

**IAB IV 2558097**

**Page 15 of 37**

**MAX HUNTSMAN**

got COVID, which wasn't true. Department heads get to decide who gets sick time and who doesn't, not the CEO, and he never retracted that. And then he actually again claimed she committed a crime. She was on the Board of Directors for the United Way, a volunteer position, and he had a press conference in which he said she voted, or participated in putting up.. I think it was a homelessness initiative on the ballot that United way liked, because they might get some money out of it, therefore it's a conflict of interest. Government Code 1090, the provision that governs conflicts of interest relating to contracts, requires that you have a financial interest. In other words, if you're a volunteer on a board for a nonprofit, it's not triggered, and the sheriff knows that; I know he knows that because his secret police squad put together a report that claimed she was a criminal, and in it they acknowledged the absence of that evidence but still claimed that she had a conflict somehow that she kept secret. And they submitted that up to the AG as well, and publicly accused her of this. And she ended up- When she retired, she got a settlement from the County with an agreement that she'll get security because of the sheriff's threats and threats that she received and other County officials have received after he publicly sets them up for targeting. Because he has an extremist base that will react to whatever he says. So at one point he accused Mary Wickham of County Counsel of going rogue, because she was advising him that what he was doing was illegal, and the next day she got a threatening phone call, from some folks who claimed that there was an arrest warrant out for her and she was going to be arrested. And the phone call came from the Sheriff's Department. And they said 'No no no, it was spoofed, it's not true' and later they claimed that they had done something about it, but they never provided the evidence or the phone records. So she- until the day she retired, she believed that she was being targeted by people as a result of the sheriff's threats.

So he took a series of actions throughout this time that have never stopped, including targeting Patty Giggans, who's the head of a group called Peace Over Violence, and Sheila Kuehl, a supervisor - they are political allies, I think, or friends, from way back. He claimed through conversations with a guy named Adam Lowe, whose wife used to work at the Metro, that there was a conflict of interest in a contract that Patty Giggans had and he got a search warrant to serve and search the Metro and the Metro's Inspector General and a bunch of stuff. And again, there was public allegations of misconduct, all based on the statements of this guy Adam Lowe, who had filed the lawsuit, which didn't go anywhere, and had been investigated by the Inspector General in that organization. And he used all that as a basis to then make Sheila Kuehl think that she was going to be arrested.

So he's done a series of things like that that haven't really stopped, nonstop. And so I do think- the thing that I'm talking about now is just the latest in a long line of them. It's not like he was silent for a while and then popped back up. And that's why I sent you before this conversation that email I'd gotten with the post recently from Adam Lowe in which he details in his letter to Merrick Garland, you know, all these- his complaints about various things, including using my name as Max-Gustaf and then at some point Max-Gustof, spelling it a third way--

**Herrera:** I saw that.

**Huntsman:** --and a variety of stuff. Well that guy, Adam Lowe, is the affiant in the warrant that they served on Peace Over Violence and Met News. So when we get into more detail about the actual CPOE claim and the holocaust accusation, which is the second thing I sent you -his claim that I'm a holocaust denier- I think he gets that from Adam Lowe. I think Adam Lowe is his supposed source based on my reading of that document that you saw, as well as other things that Adam Lowe has said. Before the sheriff ever in that communication to the department called me Max-Gustaf, Adam Lowe had used that name as well and nobody else had. Nobody else calls me that.

**Herrera:** And I want to definitely get to the Adam Lowe. I appreciate you sending me that email and I looked it over. I did want to look at- talk to you about the email that, you know, that was kind of the genesis for this complaint itself, right? So my understanding is that there was an email that was sent by the sheriff. Can you give me some more information? And I don't think it has the date, the information that I have I don't know that I have the date of the email, so do you have--

**Huntsman:** I saw you don't have it. I thought I had forwarded it and so you should've received it. I can try to track it down for you and try to get you another copy. But bas- I don't remember the date. It was earlier this year. But when he sent it, it was- you know, one of the points when he was attacking me publicly, it was sent around to the whole department, I believe, and he again accused me of - I forget what the particular issue is 'cause he accuses me of lying or being corrupt or, you know, whatever - but in that email he referred to me as Max-Gustaf with a Max-hyphen-Gustaf, and that's the thing that caused me to report it, to the CPOE because I believe he was intentionally- He has a base of extremist groups - white supremacists basically - who he dog whistles to and lets them know who their current target is, and that's how he got Mary Wickham to be targeted; that's why Sachi Hamai had to get security; and by saying Max-Gustaf, I believe he was trying to say to those guys 'This guy's a foreigner; he's either German or Jewish or

**IAB IV 2558097**

**Page 17 of 37**

**MAX HUNTSMAN**



both' and we now know with the Holocaust denier thing, he wasn't trying to sell to anybody that I was Jewish because he was claiming that I denied the Holocaust. But I think that my German descent was what made me a target for him because I would be an easy target, in the same manner that he targeted Esther Lim, I believe, because she was an easy target. He liked to target a lot of people, anybody who was a critic of his, but some people because of their race are easier for him to set up as scapegoats with his base who listen to him, including people within the department.

**Herrera:** Actually with Esther Lim, I believe he sent out something in the past where - I don't know if you're aware of it - I think where he looked at her Twitter feed.

**Huntsman:** Oh I'm very much aware of it.

**Herrera:** Right. And where--

**Huntsman:** I don't know, because my ability to investigate has been obstructed, but if I were investigating, I would investigate my belief that that's part of what he has that dirty tricks squad doing. They're supposedly investigating crime and the sheriff uses his criminal investigative authority as his shield to tell 'Nobody can ask any questions about what I'm doing'. But what I think they're doing is political work. And he had somebody go through all of Esther Lim's social media to mine statements that he thought were obnoxious. And then he put them together in a long list and sent them.. a year and some change ago to the Board, particularly to Supervisor Solis, Esther Lim's boss, to complain about her. And then a year later, more recently, he sent it again. And that was after he had taken the shot at the Chinese company that was providing COVID testing. Part of his sort of strategy for remaining sheriff is to appeal to the deputies' union and he described to Gustavo Ariano of the Times, his staff as being 80% conservative and right-wing. Now, I'm not sure that that estimate's correct, but that's his viewpoint of his staff. I do know that there is a certain percentage of his staff who are very extremist on the right and who are very anti-Chinese, and he was using that racial component to try to beef up his standing with them, and with voters who- the right wing of voters who he thinks he can get to reelect him. But at the same time, it creates, I think, a great danger to the, the people he targets because these folks are- these are dangerous people. And so that's why I connect these events. What he did with Esther, I don't think that's a coincidence. Now he could've done it with anybody and he could've done it irrespective of race. But I think he targeted her because she's Chinese.

IAB IV 2558097

Page 18 of 37

MAX HUNTSMAN

**Herrera:** Do you have any sense of how many people he has on this squad or, or how many people are [indiscernible]?

**Huntsman:** I think it's about a half dozen or so and I think it's changed a little bit over time. In the early days when he first started it, he hired a guy back to the Sheriff's Department called Lillienfeld and he was a guy - I don't know if you're familiar with him, but - if you were to Google him, you'd see that he had left the Sheriff's Department years ago and he went to work for the DA's office on a contract basis, and he got caught sneaking into the jails. He put on his old sheriff's uniform and snuck into the jails in order to bring contraband to an informant. He did it for the cause of good and justice, because he wanted this informant to help him with a murder case for the DA's office. And the contraband was, supposedly just a burrito -although nobody knows because he snuck it in- but he did it after being told no, he couldn't do it, by the Sheriff's Department. And then he used his old uniform to pretend that, you know, that he had permission and snuck in contraband.

**Herrera:** Can you spell his name again?

**Huntsman:** Lillienfeld?

**Herrera:** Okay, there you go. I've heard- I just didn't hear it, yeah.

**Huntsman:** Yeah, and that happened. I mean, it's on video. What you think about it is questionable, but the event happened. So he rehired that guy and I think he rehired him because he knew this is a guy who'll do whatever I ask him to do. He'll pull out every stop. And he put him in this unit and he also had a guy who's a computer guy, and the computer guy did a lot of computer work for him. Allegedly, I've heard numerous times over the years that he's bugging my emails and, you know, accessing stuff. I'm not sure I believe it, but I have a bug sweeper in my office as a result that I use from time to time, to try to, you know, at least have some kind of protection against it. But other people do believe it and I've been told that over and over. That guy's on the crew. So I wouldn't be surprised if that team was put onto the process of gathering stuff. But the sheriff has a lot- also has- I mentioned the PR firm he wanted to have the county pay for for him. He never got that. So instead he converted the Sheriff's Information Bureau, which is supposed to provide information to the public, which the sheriff has a legal duty to provide and doesn't, he turned them into his PR firm. So they're run by- or were run by a guy named Satterfield, a deputy, now a captain I think, because he's been promoted, who would put out PR stuff for the sheriff on a nonstop basis. And it's possible that that team did the work as well.

**IAB IV 2558097**

**Page 19 of 37**

**MAX HUNTSMAN**



But it's also possible it was done as a supposed criminal investigation. I haven't been able to investigate that. But the bottom line is, I think he collects dirt on his political opponents and then tries to figure out a way to hurt them and he turns most easily to race-based techniques 'cause I think it plays with the people he's trying to curry favor with and he uses whatever means are available to him to do that including public funds for- that should be used for criminal investigation or, in the case of SIB, should be used for Public Records Act requests, you know, all sorts of things. So that's kinda the way I see it unfolding and why I see these things as connected.

**Herrera:** And in terms of your name being Max-Gustaf Huntsman, is that.. a name that you've ever used publicly? Like, as your name?

**Huntsman:** The story of my name is that when I was born I was named Max-Gustaf Edler. My dad was German, and he came- his dad was a soldier with the Nazis, and he supposedly couldn't carry a gun 'cause he had employed Jews before the war, but they lived in Nazi Germany. His older brother hid in the woods to avoid being conscripted and when the war was over, he decided that was not a good place to hang out. So he came to Canada and then he came down to San Francisco, where he met my mom and fathered me. And he wanted to name me a German name. They settled on Max-Gustaf, which was a hyphenated name of two uncles of his; Max was one of 'em and Gustaf was the other. The F that's in that name is the Swedish spelling of Gustav and that's 'cause this guy just happened to have the Swedish spelling; I don't know why. This is all stories I've heard from my dad. My dad quit working when I was born, was doing a lot of drugs, once left me on a street corner to teach me to be self-reliant and after my mom and my dad got divorced, not long after that she moved down to LA to get away from him.

After that, he left America. He went to New York for a bit and then he went to Sweden and got himself a real family, and lived 'til the day he died in Sweden taking care of a family. He didn't do that with my family and I believe that's because of Nazi Germany. I believe he was raised with a violent hatred for authority. He was an amateur boxer and, you know, he liked punching people. He was a con artist. He actually supposedly did some time in custody. I mean, he was just a piece of work - as a result of the Holocaust. Not what was done to the Jews but the way Nazis functioned, and I think they did a lot of damage. I don't claim that's as bad as the Holocaust, but it had a direct impact on me. So the idea that I would deny the Holocaust is crazy. I have no love for Nazi Germany; quite the opposite.

But back to the name part. So he names me Max-Gustaf Edler. When I was a kid, I said to my mom--

**Herrera:** I'm sorry, Max-Gustaf, what was the last name?

**Huntsman:** Edler. I pronounce it A-dler because that's the German pronunciation and I'm telling you about the early life.

**Herrera:** And how is that spelled?

**Huntsman:** E-D-L-E-R.

**Herrera:** Okay. Sorry.

**Huntsman:** And that's- Gustaf is a first name with a hyphen. I have no middle name, never had a middle name.

**Herrera:** Got it.

**Huntsman:** So when I was a kid, I told my mom, 'I don't want to have the name Edler. That's my dad's name. I don't like my dad. I like you. You raised me.' Sorry, I get a little emotional about this - I apologize - when I think about it. My mom said 'no'. She said 'When you grow up, you can do whatever you want, but until then I'm not changing your name.' So when I grew up - and by growing up, I mean I went to law school, and I was a law clerk at the firm Tuttle & Taylor, that Jerry Brown used to work at many years ago. And I got one of the partners there to help me change my name. And I went into court and legally changed it, from- to Huntsman from Edler. I didn't get rid of the Max-Gustaf legally. So I was Max-Gustaf Huntsman on paper. I never used Max-Gustaf and nobody ever knew me by that. I just went by Max. And when I became the inspector general, I got lucky and I- I can't really tell you how this happened, but one way or another- 'cause I would use Max and I would write Max on most things, but like on my tax returns I'd write Max-Gustaf and the state bar had me down as Max-Gustaf. So, like, you know, my formal name was Max-Gustaf; I never hardly used it.

Somehow or another I got a passport that had Max on it, just Max and not Max-Gustaf, and so as a result, under California law you can't change your name unless you go to court and do a bunch of things that I didn't want to do, unless you have some documents to show that your name is this other thing. So as soon as I had a passport that said Max on it, I was able to go into the DMV and go, 'Look, my name's Max,' and they changed my name to Max. And I was able to go to the County and say, 'Look, my name is Max' and they changed my name to Max. So I

**IAB IV 2558097**

**Page 21 of 37**

**MAX HUNTSMAN**

changed my name everywhere to Max. But on some obscure county computers, they never changed it correctly and the state bar still had me down as Max-Gustaf. But in all other contexts: federal government, county government it's Max and I never ever use Max-Gustaf to talk to anybody. Nobody would ever tell you, 'Oh that guy's name is Max-Gustaf.' There is one cop I used to work with in the DA's office who used to call me Goose just as a joke, and that was it.

But I'd never gotten the state bar changed until the sheriff did this and then I called them up and said, 'Guys, can you pull that?' So they said, 'Yes, yes we'll make you Max.' Now if you run me on the state bar, there's an entry for a guy named Max Huntsman and there's an entry for a guy named Max-Gustaf Huntsman, 'cause they didn't change it; they just stuck another one in. So that's the story of how I use my name and that- it's a long slow burn, all from the fact that I didn't particularly like my dad very much. And I didn't want to have anything to do with him. When I got to turn over a new leaf as inspector general, I, 'you know what, I'm just dropping that -Gustaf part. I won't even do that,' 'cause I'm not a German. I've got nothing against Germans particularly, aside from Nazis, but I'm not one; I'm an American. He came from Europe and, you know, my mom raised me here in America and, you know, that's who I am. So anyway, that's my story.

**Herrera:** And what's your mom's heritage?

**Huntsman:** Well, her dad came from Canada - white, generic white. Her dad came from Canada. He had come back years earlier from Scotland. I think he actually came from Scotland or maybe his dad's dad did or something. But he, he came down out of Canada and on the other side, on my grandmother's side, they were, like, Daughters of the American Revolution. Her family had been here, like, before the American Revolution. They came- supposedly the story- my daughter tells me this isn't true, but my story was that we were related to John Rolf of the Pocahontas story, 'cause one of our ancestors was Rolf, but my daughter looked into it and said, 'No that guy had no kids. So you might be related to him, but you're not a descendant of him.' But in any event, they were just Americans, you know, white European-type Americans but not, not anything else.

**Herrera:** Would that be British if they were Daughters of the American Revolution?

**Huntsman:** That side, on that side. If you want to divide me up, on my mom's side it's half British with a little bit of, like, French or something in there, and on my mom's dad's side, it's mainly Scottish. So it's like British Scottish

IAB IV 2558097

Page 22 of 37

MAX HUNTSMAN

on her side and then on my dad's side, he's pretty much German with a little bit of Russian and I think a little bit of Polish.

**Herrera:** Okay.

**Huntsman:** But in terms of culture, he didn't raise me with any kind of German culture or anything and my mom, by the time, you know- my mom was a hippie. She was a beatnik; she wasn't a hippie. She was before the hippies.

**Herrera:** San Francisco.

**Huntsman:** Yeah exactly. I was conceived on a houseboat in Mill Valley. You can't get more beatnik than that.

**Herrera:** That's a very auspicious beginning.

**Huntsman:** So, you know, that, to the extent that I have a culture, that's my culture. And I've had this conversation with people, you know, I don't feel- I feel like I'm a cultureless person, other than being an American. It's not like it's a supremacy thing at all. I'm not in favor of that approach. I'm jealous of people who have a real culture. And so it's a thing that I wish that I had and I think that's part of my own read psychology 'cause of my dad. But the bottom line is, I'm not German.

**Herrera:** Right. Now, my understanding is that there was a KFI.. So there was the email that went out and do you recall who that email went to that the sheriff had sent?

**Huntsman:** I think it was the entire sheriff's department. I'll have to track it down for you since you didn't get it. I sent it in to CPOE and I'm sure I've got a copy of it somewhere.

**Herrera:** I can hunt it down myself as well. I just didn't want to delay talking to you because I think it [indiscernible].

**Huntsman:** No no no, it's not important. But it was- Yeah, it was- I think it was sent out to the entire Sheriff's Department. But it's not, it's not- There's more than one time he used that Max-Gustaf, and he talked about it, and I think on KFI he talked about, 'Oh we need to look into why, why did he change his name? What's he trying to hide?' you know. And so, to be clear, like I said, I gave you the reason I changed my name. Since 1991 I've worked for the county and was a deputy district attorney for 20 years before I was this. I'm not hiding a secret past. You know, there's no fraud or process by which I changed it in order to conceal who I am

**IAB IV 2558097**

**Page 23 of 37**

**MAX HUNTSMAN**

in any way, shape or form. It's just I don't like to be associated with a culture that I'm not part of.

**Herrera:** You mentioned - and I didn't ask this, but - so you were a deputy DA prior to becoming the IG? How long were you with the DA's office?

**Huntsman:** When I graduated law school in 1991, I joined the DA's office before I passed the bar and I was a DA- once I passed the bar, I became a DA and then I stayed there until 2013, when I took the job as Inspector General.

**Herrera:** So when you changed your name, was that while you were in law school? Like, was that a job decision?

**Huntsman:** Yeah, that was- I became Huntsman before I joined the DA's office. So as a kid I'd been Edler; when I was in law school I was Edler until, like, my senior year and then I was Huntsman. And then when I graduated from law school and joined the DA's office, I was Huntsman. So nobody in the DA's office ever knew me as Edler.

**Herrera:** Okay, got it. Because you mentioned you worked at Jerry Brown's old law firm, so I just wasn't sure of the timing of that. Was that during law school?

**Huntsman:** I was a senior- not senior, a summer law clerk after my second year of law school.

**Herrera:** And so.. aside from the email- So then the KFI, the KFI radio call, do you recall what was said during that KFI radio appearance? And was there more than one or is it just one appearance?

**Huntsman:** I don't now recall. On KFI he talked about it and, like I said, it used to be kind of clear in my head, but then when he went to the Times Editorial Board and told them I was a Holocaust denier, it kind of made the details of what he said about my name irrelevant to me. So I don't remember precisely what he said on KFI.

**Herrera:** You did say something to the effect of, you know, that they should look into why he changed his name or what is he trying to hide?

**Huntsman:** Yeah, I mentioned that. He said that somewhere; I think that may have been on KFI. I don't remember now where he said that, but that's, like, a thing he likes to say and he said the same thing to the Board. But he likes to say, 'Well, somebody should look into that.' He does- he's very fond of, like, Facebook Live videos and Instagram videos in which he'll

have, like, a chat and he'll sit there at his desk and he'll pull pieces of paper and talk about them, like a talk-show host or something, and then just sort of ruminate about them. That's how he talked about Sachi Hamai when he accused her of the 1090 violation. He said, 'Woah, I just got this in from.. from Vivian, oh thank you. Oh, somebody should look into this,' you know. And he effects this kind of casual way of talking about things and I think it was in the same context. He said, 'Somebody should look into that,' as sort of a vague allegation that there's some nefarious reason for why my name changed.

**Herrera:** Did you feel like he was casting aspersions or trying to make some type of negative inference?

**Huntsman:** Yeah, absolutely. Yeah, definitely.

**Herrera:** And I know you mentioned that you believe it may have been, like, for example, a dog whistle, but if his people are these radical, maybe right-wing, wouldn't that be more in line with their viewpoint if you were.. you know?

**Huntsman:** It might be if he had presented me as an Aryan, but he didn't, you know. So that's why when he first did it, my take on it was he was trying to imply I was Jewish. And that would be what I was- that's what I thought he was doing. I may not have been correct about that, but that's just- that's how I took it. And so that's the way I took it. What I think was really going on- I mean, again, it's, being a foreigner I think is the main thing. So you're right; if white supremacists really cared about, you know, true Nazism, then none of them would qualify because most of us here in America are not the Aryans that the Third Reich was obsessed with. But that's not how we look at the world.

**Herrera:** Maybe the Third Reich weren't all that Aryan either.

**Huntsman:** Right, exactly. That's my understanding too, but you know, that's ancient history, but for here and now, I think it's really more about an ideology and a way of looking at things and again, I think he was simply designating me as a target and as an 'other' and he didn't really care too much about how people took it. Other than they knew: this is a guy who is an enemy of ours. In the same way that recently the Board had voted to, put before the voters the right to remove the sheriff with a four-fifths vote. As soon as that happened, that was put out on Breitbart, the highly conservative outlet, about it and how Democrats were trying to take away the rights of, you know, a favored sheriff, and immediately there started to be a series of Twitter feeds from right-wing extremists in Florida and other places talking about how outrageous it was. I think

IAB IV 2558097

Page 25 of 37

MAX HUNTSMAN



that's the technique that the sheriff uses. It's more about designating the target than about the details of why deputy designated. I think he selected these things because they play well, because the race angle plays well.

But now in hindsight, I think he probably had already had a bunch of conversations with Adam Lowe about not just the name but about the Holocaust-denying claim. And so I think really he was setting that up. But at the time, I didn't know that. I thought what he was doing was just trying to make me look like, you know, I'm the target. But I think really what was going on was he was preparing for the next one. And of course, it's weird to say somebody's Jewish and a Holocaust denier. So I assume that was not his plan. But again, I think he's getting this stuff from Adam Lowe, who's a little bit crazy I think. From the document you saw, you know, he's- When we subpoenaed from him, he had an interchange with Lillienfeld, the guy I talked about before, when Lillienfeld recorded him- or, Adam Lowe recorded Lillienfeld while Lillienfeld was kind of threatening Adam Lowe, telling him to back off 'cause he had sent some emails to Murakami. And so Lillienfeld had been dispatched, or voluntarily dispatched himself, to tell Adam Lowe to settle down. Adam Lowe recorded it all; we subpoenaed it; he refused to provide it; and I think that's when I got on Adam Lowe's radar as somebody he was going to target. And I think the sheriff had already, taken Adam Lowe as an ally, used him in his process to try to get a search warrant.

So I think he got from Adam Lowe the 'Hey I think I've got some dirt on Huntsman. I think he's a Holocaust denier. I think he's a bad guy, this is what I think.' I don't know where he gets that from because I have never denied the Holocaust. There isn't some old college paper that I wrote in which I question the Holocaust. You know, it never happened. My guess is that Adam Lowe ran some database and found some name that sounds kind of German, you know, of somebody who denied the Holocaust. But it sure wasn't me.

**Herrera:** So with regards to, for example, once the email the sheriff sent and then, for example, the KFI, the radio show he's making these statements, did you receive any type of emails or any type of calls or any type of negative attention? Have you received any kind of...

**Huntsman:** Once he accused me of being a Holocaust denier to the LA Times, you know, in a very public way and it became an Op Ed in the Times and a whole discussion, and a number of media sources talked about it because it was such an outrageous claim, especially - I don't know if you watched the video of that, but if you think it's relevant, you might

**IAB IV 2558097**

**Page 26 of 37**

**MAX HUNTSMAN**

want to pull up the video - but that Op Ed I sent you kind of encapsulates it. They asked him, 'What's your evidence for that?' He said, 'Well I'm not going to tell you.' And they said, 'Well if you're going to accuse somebody of such a horrible thing but not provide any evidence, should we believe you?' And he said, 'Yes you should believe me.' I mean, it was kinda nutty, so it became a story. After that, I did not receive any death threats or any weird emails from crazy people any more than usual. I certainly have had an increase in, like, when I monitor comments on, certain websites like Witness LA or other places, where there's always kind of a chatter and I'm always kind of the enemy in the eyes of these extremists. I mean, there's certainly stuff like that, but there wasn't a lot of Holocaust stuff because - I shouldn't say because - the sheriff had previously already presented me as sort of his main enemy and there's always been a lot of attacks on me like that. But I didn't- I didn't notice any that were specifically Holocaust-related. I did receive a lot of communications from people I know who, you know, expressions of sympathy and ironically most of them from friends of mine who are Jewish. Because I think if you're Jewish, you know how disgusting and deeply offensive that allegation is. I think if you're not Jewish, it seems wrong to say that about somebody, and if you're Jewish, it's evil. And so a number of my friends who are Jewish were like, 'Oh my God, Max, I can't believe you said that. That's horrible,' you know. And so it's actually been a pretty positive thing.

I sent an email to the Board about it, which is what I kind of forwarded to CPOE, to go on the record and say, 'Look, it's not true,' because it hurt me so deeply, for the reasons I described. I'm not Jewish, but I have a certain connection to the Holocaust that is not positive. And so I take it to heart more than maybe I otherwise would. I don't know. I don't know what a person would think if they were called that, if they had no connection, I don't know. But all I can tell you is emotionally for me it was hideous. It's still hideous. Like I say, I was tearing up talking about it. But when I was tearing up when we were talking, that wasn't because of the Holocaust; that was because of my history, my dad. I'm like an eggshell plaintiff in this. It's not just the threat and the insult and the allegation; it's what it means to me personally.

**Herrera:** Can I take just a one-minute break? I locked my husband out of the house, so (laughs).

**Huntsman:** I'll just sit here. Go ahead, don't touch anything and come on back when you're ready.

**Herrera:** I'm so sorry. I'll be right back. I'm just going off the record at 3:15.

---

IAB IV 2558097

Page 27 of 37

MAX HUNTSMAN



**Herrera:** Back on the record. It's 3:16. So, my understanding is that I think on March 31<sup>st</sup>, you sent - or was it 30<sup>th</sup> - you sent an email to, is it- I don't know what the DCO stands for: Deputy Chief Officer Seiberg, or Seeberg? - regarding the Editorial Board comments, the comments to the Times about being a Holocaust denier, do you recall doing that?

**Huntsman:** Can you give me the spelling of the name you're saying?

**Herrera:** S-I-E-B-E-R-G.

**Huntsman:** I'm sorry, I don't know who that is. I probably did do something that created what you're talking about and, as I recall it, I sent an email to the Board and then I decided 'No, I'd better tell this to CPOE because it' - Oh I think you're fro-, no you're there; I was afraid you were frozen - 'I think I'd better tell it to CPOE because not only, not that I'm complaining about it because, for the reasons we discussed in the beginning, I'm very cynical about whether or not the sheriff is going to discipline himself, but I figured I had a duty to my employees to do something about this because CPOE rules are pretty strict about reporting when you're aware of certain facts.

**Herrera:** Right.

**Huntsman:** So I sent it- I would've said I sent it to Vicky Bane, who's the head of CPOE, but I'll bet you whatever I sent somehow generated the thing that you're referring to.

**Herrera:** Okay. And then, I think as a followup--

**Huntsman:** Unless Seiberg is Sheriff's Department. That could be an echo of what I sent.

**Herrera:** It could be.

**Huntsman:** It could be, 'cause I sent something to Vicky Bane. The process for CPOE for everybody else in the county is the CPOE investigates. For the sheriff's, they get to investigate themselves. So whenever there's a CPOE complaint regarding the sheriff, they forward it to the sheriff. So that may be the forwarding from the county CPOE to the sheriff's department.

**Herrera:** Right. And then it makes reference to.. I think on April 1<sup>st</sup> you communicated with this person and it may be that they are in the sheriff's office, stating that 'I'm not blaming you, but be sure to tell all

IAB IV 2558097

Page 28 of 37

MAX HUNTSMAN

the victims you interview that the LASD CPOE process is not confidential and the sheriff will discuss them with the media.' So I think that gets into that last point of...

**Huntsman:** That person is the person I told you about who I talked to at the sheriff's department. She called me and then set up an interview and we had an interview, and we went through the same thing I'm going through with you. Not all of it at that point, but he had at the Times said, in addition to the Holocaust thing, he said, 'and Max Huntsman's made a CPOE complaint against me, ha ha.' So that's why I said that to her. I'm, like, 'Look, the whole claim that it's confidential is a joke. The sheriff already was informed about it and he already told the public.' So.

**Herrera:** Okay, now I see what you're saying about the confidentiality, because I wasn't sure what you were referring to, but that makes sense.

**Huntsman:** I was referring to his public announcement, the Times Editorial Board, that I had made a CPOE complaint against him. Which is completely in violation of CPOE rules. So that- I apologize, but--

**Herrera:** Not only they would be--

**Huntsman:** --I'm a little cynical about the sheriff's process and whether or not it was going to be confidential.

**Herrera:** Right. I can only tell you that, I'm not talking to the sheriff. I guarantee that I'm probably not going to be his favorite person.

**Huntsman:** No I understand now. I understand- it was the admonition you gave me 'from the Sheriff's Department' that threw me off for a minute.

**Herrera:** Yeah and I apologize.

**Huntsman:** Probably already, you get hired by County Counsel; County Counsel gave you a task: you're going to collect a bunch of stuff, you're going to give it back to County Counsel. If anybody tells the sheriff anything, it's going to be County Counsel. And to be clear, it doesn't matter. The sheriff already knows all these things. The sheriff knows that I'm no fan of his because I- Sorry, my phone froze for a moment - the sheriff knows because I publicly record all my criticism of him, so he knows how I feel. So if you did call up the sheriff right now and tell him that, it wouldn't do anything worse to me. He already is, you know, fixated on me as much as he is ever going to be. It's just that I'm really- As the Inspector General for the county, and it's my job to protect the constitutional and other rights of our employees and the public from the

sheriff, when I'm aware that the sheriff is simply disregarding the rules of CPOE so he can target individuals, people like Esther Lim come to mind. You know, I get paid for this. I used to be a prosecutor. I get paid to take on armed men and do gang busting. She doesn't, nor do any of the other people who he's targeted. So that's why I was a little frustrated with that whole process because it's just- it's so unfair and it's so dishonest, to the people within government service than when we allow somebody like this to engage in this conduct, you know. It just is very disheartening to me, to be a process that CPOE- I've been involved with in my office, and worked with CPOE in investigations and found them to be completely above reproach in their confidentiality and reasonableness in how they deal with things: very careful, very thoughtful, very sensitive to those making complaints and those who are being complained about and, you know, carefully gathering facts, and then crafting the solution that's going to protect people. I mean, it's an amazing process - until you hand it over to the sheriff. So that was my point.

**Herrera:** Okay, so that makes sense. Now I get it. And then- just going back- I think we're almost done, but going back to Adam Lowe, I just want a little bit more information about who exactly he is 'cause I did read - and again, thank you for what you had sent to me - but I'm trying to understand exactly who he is and what your relation or contact has been with him.

**Huntsman:** Adam Lowe is the husband of a woman who was employed by Metro. Metro is basically a joint powers agency that's sort of controlled by the county, sort of controlled by LA City and its Board includes, by law, I think two supervisors at a time and they rotate, or whatever, as well as some other folks. They have an inspector general; they have a executive director and they run, you know, the Metro system. So, Adam Lowe's wife was an employee there and she was unhappy. I don't know the details of why, but she didn't feel that she was being treated properly. And she started to complain about that and eventually she quit or was fired or what have you. And once that happened, he made a campaign of attacking first the executive director, a guy named Washington, who is mentioned in that letter that I sent to you; and then somewhere along the line he decided that he was aware of a great corruption and that he needed to let people know. And I think the theory in his head was, this corruption was why my wife got fired, or not treated properly and had to quit, because she was a whistleblower about this and therefore, if I can convince people that this is true, then they will see that my wife is a victim and they will give her money or a new job or whatever.

He filed a federal lawsuit; he spoke to every media outlet that would ever listen to him; and my first relationship with him was maybe a year, two years ago - I forget how long, it was a long time ago - where he stuck me on one of his email lists and he would periodically send out these emails to everybody, I mean, to anybody he could think of to stick on there including the media and he sent out these emails saying, 'You know, I've got the goods. I'm meeting with the FBI tomorrow. I've just given all this stuff to the Grand Jury.' You know, all these claims that, having experience as a corruption prosecutor, I was pretty sure were not true. 'Cause that's not how it works, you know. But in any event, he was saying these things and I remember reading these allegations. Now the allegations were that Sheila Kuehl, in her position as a Board member at the Metro, had caused the issuance of a contract to Patty Giggans' group Peace Over Violence. It is true that Peace Over Violence had a contract with the Metro to provide sexual assault hotline services. I don't think Sheila Kuehl had anything to do with him getting it. I don't know that, but I don't think she did. And again, back to our conflict of interest stuff, I'm not aware of any flow of money that would close that circle, that would prevent Sheila Kuehl from causing Patty Giggans to get a benefit like that; unless Patty Giggans gives her money, right? You can give campaign contributions - that's totally okay. It's crazy, but in American California law, that's okay - but you can't, like, give them a hundred thousand dollars to put into their personal account, or hire them for some other job. So, as far as I know, there's no connection like that.

But that was the claim, was that that contract was somehow bad, and it was looked into by the IG at the Metro, I understand - I don't- haven't read that report - and there was an element of the claim that was interesting, which was that not only was the creation of the contract flawed but also the contract itself was fraudulent. And supposedly the basis for this - and I don't know if it's factually true or not, but this was the claim - was that, you know, when you look at how many calls they've gotten on their hotline? It's not a lot of calls. And they're getting paid by a flat rate or some certain amount of money and if you work out how much it is per call, it's a really small number- I mean it's a really large number. They're getting paid way too much money for each call. And so therefore this is not in the interest of the public and it's a rip-off. That was basically the claim. So he made that claim; he tried to sell it and federal lawsuit didn't go anywhere; it was eventually dismissed. He sent it out to all the media outlets to people like me, to see who would, you know, champion this cause. Nobody. Until he got the attention of the sheriff, and the sheriff I think referred him to his dirty tricks squad and said, 'Hey, this guy has something bad to say about one of the people who has oversight over me, Sheila Kuehl, and Patty Giggans',

who was at the time the chairman of the Civilian Oversight Commission. And I think they went to town on it. They got a warrant. There's a whole bunch of litigation regarding that warrant and blah blah blah, so on and so forth, and the warrant included getting personal identifying information for the people who called the hotline, even though the hotline's supposed to be confidential, and they wanted to get the names and contact information for all the people who'd called the hotline, and they got a judge to sign off on that, whatever. So that's how Adam Lowe came into my life and how he became relevant.

And a bunch of things happened after that. Eventually he had that conversation with Lillienfeld, which he- and then he took the tape and put it out on the internet. And we tried to get a copy of it after he put it on the internet and he refused to give it to us and wrote a bunch of weird.. things that looked like motions, like legal motions, but he didn't file them or anything; he just sent them to us. He never showed up, so he's in contempt of court except that we haven't certified it to the court. We told the Attorney General's office 'cause I figured, you know what, at the end of the day I don't have the power to do anything. If Lillienfeld is shaking down citizens with threats from Murakami, I can't do anything about it. I've told the public 'til I'm blue in the face about the illegal things happening at the Sheriff's Department. I've told the Attorney General; I've told the DA's office. You know, what's the point? If they want to go get that recording and litigate it, they can. I've got more important things to litigate. So that was the Adam Lowe thing, but once we subpoenaed that from Adam Lowe, he came to dislike me immensely. And so in that letter, as you can see, he said that I'm harassing his family and doing horrible things. The only thing we did is we served him with a subpoena.

**Herrera:** [unintelligible 12447] saying that you had an obligation to investigate Sheila Kuehl or anything like that, in your capacity as an IG or in oversight.

**Huntsman:** No I don't think he said that. I think I ended up just on his email list, because - and I often do - there's a lot of people - not a lot, but a few - very enthusiastic people who might be insane, but I don't know, who send regular emails and they attach me on because I have an interesting title that sounds like I might care. And so I get, like, stuff about the Veterans Administration all the time. It has nothing to do with me. So I don't know that he thought I had any direct responsibility including, I think by now he's had lots of conversations with the sheriff and so he has decided that I'm, you know, part of the evil empire that Sheila Kuehl is running or something. But I don't think in the early days, when he put my name on it, he had any reason to think that I had

IAB IV 2558097

Page 32 of 37

MAX HUNTSMAN

responsibility over it or did he ever say that to me. He never said, 'Hey Max, you should investigate this.' He did- I've actually talked to him a couple of times 'cause he runs something called the AMFED. He uses a pseudonym: Jack London, I think, and puts out a bunch of kind of odd things on the internet. And he made some PRA requests and whatnot. And I had some conversations with him and he was relatively straightforward in the early days, before he had decided that I was evil, about [unintelligible 12601] that he was trying to collect and do.

He's an interesting fellow, but I think he's- He used the term Max-Gustaf and even before this letter I'd seen him use it - I forget where or when, but in, like, one of his AMFED things. The Federalist Society of course, you probably know from law school, is a conservative group.

**Herrera:** Personally.

**Huntsman:** The AMFED is I think something he just made up, but I think he uses that term because he's a sort of conservative- he views himself as a conservative commentator. I don't know if he really is, but that's kind of where his sympathies seem to lie, but I don't- you know, he hasn't said.

**Herrera:** And it sounds like the only place where you might've had a public.. where the name Max-Gustaf was used publicly was the maybe the state bar.

**Huntsman:** Yeah, if you look me up on the state bar, it used to say Max-Gustaf; now it says Max-Gustaf or Max, depending on which one you pull up. But before I changed that, which was when this was all going down, if you had, you know, typed an attorney search, it would say Max-Gustaf Huntsman. And so my- I have no basis to know this, but my guess is that Adam Lowe did that: pulled up my name, said 'Hmm this is interesting, I'd better look into this,' and started running my name and, you know. I've done the same thing. I Googled. I was, like, where the hell did he come to this? Is there some guy named Max-Gustaf Edler or Max-Gustaf Huntsman or something who's a Holocaust denier? And I didn't find anything. But I think Adam Lowe has more free time on his hands and I think he probably found some Holocaust denier database that is kept by somebody and found some name on it that is close enough that he decided that's me.

**Herrera:** And you say he used your name in the past. Where do you recall him using your name?



**Huntsman:** Either in email communication or maybe in some posting on the AMFED, but I don't recall precisely where I saw it. I could try to hunt it down.

**Herrera:** So would you say that, if I look at his site there's going to be more than that, like more references to you in his site, that there's more than that?

**Huntsman:** Not much. There's a lot of weird stuff on his site and it's come and gone. He mentioned me on the site once or twice I think, but not in any great detail and I- He might've said Max-Gustaf there, but he might've also done it in one of those emails he sent; I don't remember. All I know is, when the sheriff used Max-Gustaf, I was, like, 'Woah that's weird!' and then I thought, 'Hm, I've seen that before; I've seen that from Adam Lowe' because I think at some point he had used it in passing. But this letter that you see recently where he uses it repeatedly, as Edler in parentheses and then calls me Max-Gustolf, or whatever he does, spells it a different way, that's the first time.

**Herrera:** Oh no, I'm saying okay, yeah.

**Huntsman:** Yeah, that's the first time he's, like, really gone into detail in writing that I've seen. So that kind of makes me think I was right about my guess about where the sheriff got this from, but I don't know.

**Herrera:** And to your knowledge, do you have any sense of whether he's talked to you on KFI more than just the information that you provided in terms of that radio call?

**Huntsman:** The sheriff talking about me on KFI?

**Herrera:** Uh-huh.

**Huntsman:** Oh yeah. Oh no, I gave you just a little tiny bit having to do with this issue. The sheriff talks about me all the time on any media outlet he can: FOX, Hannity, the.. he does an Instagram, does video sometimes, his Facebook videos, and he regularly talks about me 'and my evil ways'. Many many times over the past years.

**Herrera:** And is he referring to you as Max-Gustaf in those talks?

**Huntsman:** I don't know that he does in most cases. When this happened, he- there was a brief time where he seemed to use Max-Gustaf more often, but I think he lost it, his attention wavered a bit and so. Usually in correspondence he'd call me Max Huntsman and he had previous to this until he did that a couple of times, and subsequently he's gone back

IAB IV 2558097

Page 34 of 37

MAX HUNTSMAN

to Max Huntsman, with a few exceptions here and there. But in general he does not call me Max. He doesn't, like, every time call me Max-Gustaf and, you know, make a big deal out of it. That's not the case. Usually he calls me Max Huntsman 'cause that's the name I use and that's what people know. If he talks about Max-Gustaf, nobody's going to know who it is. But, now and again he's done it, but not every time at all.

**Herrera:** When he got the scrutiny after the editorial, the comments to the Editorial Board, did he go back to using Max Huntsman?

**Huntsman:** He has, but I didn't get the impression he did it quickly as a reaction or something, but I don't know. Yes, like in letters and things, they still use Max Huntsman, but they never really went away from it. Like I say, he always threw the Max-Gustaf in once or twice, and from that I drew- He knows darn well my name is Max Huntsman. He uses Max Huntsman in formal letters and so he knows. Whenever he uses Max-Gustaf, it's an intentional thing that he's doing to make a point. Like I say, I never got the impression that it was a habit. I don't think he switched to calling me Max-Gustaf all the time. I think he did it in a couple of targeted instances. But yeah, no, he didn't- When he got the heat about the Holocaust thing, he didn't have a lot to say except for when the Times Editorial Board was talking to him, in which he said he had two sources, and he wouldn't say who they were. He didn't talk about it much after that, that I'm aware of. He may have, but I didn't hear about it.

**Herrera:** Is there anything else I should know? Anything that I've missed that I haven't asked you about? I know I've taken a lot of your time and I appreciate you being so available.

**Huntsman:** I appreciate you asking all the questions. I'm sure I could think of lots more things to say, but I don't know that they'd be terribly productive and they'd take up even more of your time, so. I think I've kind of laid things out well enough. I think you get the gist of it and.. I'm available if you have any additional questions in the future.

**Herrera:** Thank you so much. I really appreciate it, and to the extent that there's any other articles or any other thing that you think I should be aware of, you're certainly- more than welcome to email it to me and send it to me. I obviously will be doing my own scouring of the internet to make sure that I've caught any type of references or any other referrals to it. But, you know, certainly with, like, for example, the KFI, you know, I'm probably limited in being able to know how many times he's mentioned you 'cause I don't know that they're really going to catalogue that. So if there's any other instances of that or anything else that you become



aware of, I'd be grateful if you would let me know. But certainly on our end we will make sure that we try to do our best to make sure we capture any other references so that we're aware of any other times where he's made those same kind of references to that.

**Huntsman:** And if it comes up again, I mean, if he starts doing it again or something, I will certainly let you know.

**Herrera:** Great. Oh and.. I did forget my part of the admonition of "retaliation is not tolerated at the county. It is against, obviously, county, state and federal law. If you feel like you're a victim of retaliation in any way, I want you to let me know and I would escalate it to the proper person. Likewise, we ask that you don't retaliate against anyone who is participating in this investigation. All allegations of retaliation are taken very seriously." So.

**Huntsman:** Let me extend to that. Esther and I have talked, about her concerns. She wanted me to be a representative for her when she thought she was going to be interviewed by the Sheriff's Department. So I'm glad that you are doing it and not them. I would very much like to protect her from retaliation. Me? I get retaliated by the sheriff every chance he gets and he would do that independent of this. So he's not going to retaliate against me for this; he's retaliating against me for previous things. So I'm not too worried about that. He's going to do everything he can and nobody can stop it. But Esther Lim, she's in a dangerous spot, you know. So if you ever find yourself in a situation where you're aware of some retaliation against her and there's anything I can do to help with it, please let me know. Because like you say, the County is supposed to stop people from being retaliated against and I think she's much more vulnerable than I am.

**Herrera:** Alright. And, you know, this type of work only works to deal with these types of investigations if you make people- you know, if you protect them and make every effort to maintain the confidentiality and so I am very mindful of that and will, you know, make every effort to.

**Huntsman:** And obviously I'm not the first person you should call because that would be breaking confidentiality.

**Herrera:** Which I wouldn't do.

**Huntsman:** But if in the course of finding something out you learned there is a problem and there's anything that somebody whose title is Inspector General can do to help about it, then tell the appropriate parties, 'Hey you know, Huntsman would jump at the chance to be helpful in this

IAB IV 2558097

Page 36 of 37

MAX HUNTSMAN

regard.' I have informants who have had retaliation attempts from the sheriff and I have done things using my official powers to try to put him on notice, that we're watching and done things to try to protect informants myself. So I don't know that there's probably much- I mean, all the things he can do he does from a distance and he's going to do anyway, but, and he probably can't get under the skin and do the things that he does to his own employees, but.. anyway. It's a matter of more concern for me than my own personal retaliation 'cause I, you know, I know he's going to unload on me in every way he can every opportunity he gets and it's independent of this. It's not 'cause of this; it's not retaliation. But her, you know, she's a little bit below his radar and this process could quickly onto his radar and that's of concern. So I just mention it in case you find yourself consulting with County Counsel in an opportunity to suggest something, feel free. Just be aware that I would love to help if I could.

**Herrera:** Thank you so much for that information and I appreciate it. You have a great rest of your day. I'm going to go off the record at 3:38 PM. Have a good day. Thank you.

**Huntsman:** Okay. Bye bye.

**Herrera:** Take care.

HUNTSMAN, MAX (IAB) IV 2558097  
WPU  
plw

IAB IV 2558097

Page 37 of 37

MAX HUNTSMAN

# EXHIBITS

# EXHIBIT A

CONFIDENTIAL

COLA002093

EXHIBIT 38 - Page 650

For CISU Use:

(Method of Receipt)

**Online**

**ICMS # 2022-112213**

## COUNTY POLICY OF EQUITY

### REPORT / NOTIFICATION FORM

#### Methods of Reporting Potential County Policy of Equity (CPOE) Violations:

1. You may use this form to report a potential violation of the CPOE;
2. File an online complaint at <https://ceop.bos.lacounty.gov> (strongly encouraged);
3. Call the County Intake Specialist Unit (CISU) at (855) 999-CEOP (2367); or
4. Visit the CISU office at the Kenneth Hahn Hall of Administration building located at 500 West Temple Street, Suite B-26, Los Angeles, CA 90012.

---

#### 1. Do you wish to file this complaint anonymously?

☐

Yes (Do not check 'Yes' if you are a reporting supervisor/manager).

☒

No (If no, please proceed to Question #2).

#### 2. Are you filing this complaint for :

☐

**Yourself** (If filing this complaint for yourself, please start at Section A).

☒

**Someone else** (If you are filing this complaint for someone else, please start at Section A).

☐

**Someone else: I am a reporting supervisor/manager** (please start at Section A).

---

**Note to Supervisors/Managers:** As a County Manager/Supervisor, it is the County's expectation that the CPOE complaint notification be submitted online at <https://ceop.bos.lacounty.gov>.

**Section A: Reporting Party Information**

Today's Date: 03/09/2022

Name MAX HUNTSMAN Emp # e410745 Title INSPECTOR GENERAL (UC)  
Work # [REDACTED] Mobile # \_\_\_\_\_ Work Hrs \_\_\_\_\_  
RDO \_\_\_\_\_  
  
Department BOARD OF SUPERVISORS Dept Head \_\_\_\_\_  
OFFICE OF INSPECTOR  
Unit of Assignment GENERAL  
561 BRADFORD ST. PASADENA  
Work Address CA 91105  
Immediate Supervisor JEFFREY LEVINSON

Date & Time Form Completed: 03/09/2022 07:57 AM

Did the complainant notify a supervisor/manager of this complaint prior to now?

☐

Yes (if yes, fill in details):

Name of Supervisor Notified:

Date: NOT AVAILABLE

How:

☐

No

☐

Do not know

**Section B: Complainant(s) Information**

<b>Name</b>	<u>MAX HUNTSMAN</u>	<b>Emp #</b>	<u>e410745</u>	<b>Title</b>	<u>INSPECTOR GENERAL (UC)</u>
<b>Work #</b>	<u>[REDACTED]</u>	<b>Mobile #</b>	<u></u>	<b>Work Hrs</b>	<u></u>
				<b>RDO</b>	<u></u>
<b>Department</b>	<u>BOARD OF SUPERVISORS</u>	<b>Dept Head</b>	<u>Celia Zavala</u>		
<b>Unit of Assignment</b>	<u>OFFICE OF INSPECTOR GENERAL</u>				
<b>Work Location</b>	<u>OFFICE OF INSPECTOR GENERAL</u>				
<b>Immediate Supervisor</b>	<u>JEFFREY LEVINSON</u>				

**Section C: Alleged Involved Party(ies) Information**

<b>Name</b>	ALEJANDRO VILLANUEVA	<b>Emp #</b>	e246296	<b>Title</b>	SHERIFF/UNCLASSIFIED
<b>Work #</b>	(562) 694-2400	<b>Mobile #</b>		<b>Work Hrs</b>	
				<b>RDO</b>	
<b>Department</b>	OTHER - Sheriff	<b>Dept Head</b>			
<b>Unit of Assignment</b>	OFFICE OF THE SHERIFF				
<b>Work Location</b>	HALL OF JUSTICE				
<b>Immediate Supervisor</b>					



**Section D: Alleged Witness(es) Information (if they can be identified)**

**Section E: Nature of Complaint or Issue(s)**

1. What is the date of the alleged potential violation(s)? March 8, 2022

2. Please provide a detailed summary of the alleged potential violation(s):

As reported by RP/CP Huntsman: "...T]he Sheriff sent an email throughout the Sheriff's Department that was a racially biased attack." RP/CP writes, " My birth name was Max-Gustaf Edler. My father did not participate in raising me and so I took my mother's family name Huntsman as a law student with the help of a firm I clerked for. As Inspector General I have never used any name other than Max Huntsman, which is also my name on my driver's license and passport. A county computer system continues to incorrectly list my first name as Max-Gustaf and the sheriff has repeatedly referred to me as Max-Gustaf in public attacks. I believe this is dog whistling to the extremists he caters to as the more unusual name might lead some to view me as foreign (German or Jewish)."

3. Why does the Complainant(s) believe the treatment occurred/is occurring?:

Race

**Section F: TO BE COMPLETED BY SUPERVISORS/MANAGERS ONLY**

Date & time supervisor/manager observed and/or was notified of the alleged potential violation(s):

n/a

How was supervisor/manager made aware of the alleged potential violation(s)? (Explain in detail):

What action(s), if any, did the supervisor/manager take? (Explain in detail):

Did the supervisor/manager ascertain whether Complainant(s) is/are in need of any of the following? (If so, please explain in space provided):

Medical Attention: \_\_\_\_\_

Protection: \_\_\_\_\_

Separation from Alleged Involved Party (ies): \_\_\_\_\_

Other Assistance: \_\_\_\_\_

Did the supervisor/manager advise the Complainant(s) that they:

May seek confidential counseling or assistance from County's Employee Assistance Program (EAP) at (213) 738-4200.

May contact the County Intake Specialist Unit (CISU) directly at (855) 999-2367, or via email at [ceop@bos.lacounty.gov](mailto:ceop@bos.lacounty.gov)

**COMPLAINT SUBMISSION**

By submitting this complaint I am declaring, under penalty of perjury under the laws of the State of California, that:

- The facts set forth herein are true and correct and based on my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe to be true;
- I believe that the facts alleged herein are jurisdictional to the County Policy of Equity (accessible at: <https://ceop.bos.lacounty.gov>), are not duplicative of facts set forth in previously filed County Policy of Equity complaints that I have filed, and
- The filing of this County Policy of Equity complaint is not a misuse or abuse of the County's Policy of Equity Complaint Process.

MAX HUNTSMAN

Printed Name

\_\_\_\_\_  
Signature

March 9, 2022

Date

**OPTIONAL: Please provide the information below for statistical purposes only****Race/Ethnicity:**

*"The employer is subject to certain governmental recordkeeping and reporting requirements for the administration of civil rights laws and regulations. In order to comply with these laws, the employer invites employees to voluntarily self-identify their race or ethnicity. Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment. The information obtained will be kept confidential and may only be used in accordance with the provisions of applicable laws, executive orders, and regulations, including those that required the information to be summarized and reported to the federal government for civil rights enforcement. When reported, data will not identify any specific individual." - (eeoc.gov)*

☐ Hispanic or Latino - A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race.

☒ White (Not Hispanic or Latino) - A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

☐ Black or African-American (Not Hispanic or Latino) A person having origins in any of the black racial groups of Africa.

☐ Native Hawaiian or Other Pacific Islander (Not Hispanic or Latino) - A person having origins in any of the peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

☐ Asian (Not Hispanic or Latino) - A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian Subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

☐ American Indian or Alaska Native (Not Hispanic or Latino) - A person having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.

☐ Two or More Races (Not Hispanic or Latino) - All persons who identify with more than one of the above five races.

**Gender:**

☒ Male

☐ Female

☐ Prefer Not to Answer

**Date of Birth:** 01/17/1965

# EXHIBIT B

CONFIDENTIAL

COLA002103

EXHIBIT 38 - Page 660

\*\*\*\*\*

Today's Date: 03 / 17 / 2022

Name: Huntsman, Max Emp. #: 410745 Rank/Title Inspector General

Work Tel# [REDACTED] ; Home Tel# [REDACTED] ; Work Hours [REDACTED] - [REDACTED] RDO [REDACTED]

Unit of Assignment: Office of Inspector General Unit Commander: Jeffrey LevinsonDivision LA County Board of Supervisors

Name of Supervisor Completing this form (if different from above): B-1 Deputy Jonathan Lested # 467422

Date & Time form completed: 03 / 17 / 2022 1200 hours.

- ☐ Anonymous (Do not provide identifying information above if anonymous. You must, however, fill out the rest of the form. **Do not check if you are a reporting supervisor.**)

Did the complainant and/or alleged victim notify a supervisor of this complaint prior to now?

- ☐ Yes (if yes, fill in details)  
Who: \_\_\_\_\_  
When: Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_ Time: \_\_\_\_ hours.  
How \_\_\_\_\_  
☐ No  
☒ Do not know

\*\*\*\*\*

## Section B: Date And Time of Potential Violation

Day, Date and time alleged violation / alleged incident occurred: 03 / 08 / 2022, \_\_\_\_\_ hours or  
between \_\_\_\_\_ / \_\_\_\_\_ and \_\_\_\_\_ / \_\_\_\_\_

If multiple incidents or unknown, explain:  
See narrative.

\*\*\*\*\*

Section C: Alleged Complainant(s) (if not the same as the Reporting Party and if they can be identified)

Same as RP \_\_\_\_\_ Employee # \_\_\_\_\_ Rank/Title \_\_\_\_\_ UOA \_\_\_\_\_

Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_

Employee # \_\_\_\_\_ Rank/Title \_\_\_\_\_ UOA \_\_\_\_\_

Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_

Employee # \_\_\_\_\_ Rank/Title \_\_\_\_\_ UOA \_\_\_\_\_

Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_

\*\*\*\*\*

**Section D:** Alleged Involved Party(ies) (if they can be identified)

Villanueva, Alejandro (Sheriff) Employee # 246296 UOA Office of Sheriff  
\_\_\_\_ Employee # \_\_\_\_\_ UOA \_\_\_\_\_  
\_\_\_\_ Employee # \_\_\_\_\_ UOA \_\_\_\_\_  
\_\_\_\_ Employee # \_\_\_\_\_ UOA \_\_\_\_\_

\*\*\*\*\*

**Section E:** Alleged Witness(es) (if they can be identified)

None Stated Employee # \_\_\_\_\_ Rank/Title \_\_\_\_\_ UOA \_\_\_\_\_  
Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_  
\_\_\_\_ Employee # \_\_\_\_\_ Rank/Title \_\_\_\_\_ UOA \_\_\_\_\_  
Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_  
\_\_\_\_ Employee # \_\_\_\_\_ Rank/Title \_\_\_\_\_ UOA \_\_\_\_\_  
Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_  
\_\_\_\_ Employee # \_\_\_\_\_ Rank/Title \_\_\_\_\_ UOA \_\_\_\_\_  
Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_

\*\*\*\*\*

**Section F:** Nature of the Complaint or Issue(s) -- Be as detailed as possible, include all incidents & evidence.

On March 16, 2022, the ISU received a County Policy of Equity report (ICMS #2022-112213) from CEOP Executive Director Vickey Bane, filed by RP/CP Max Huntsman on March 9, 2022. The narrative of the complaint stated, in part, the following

(verbatim): "...The Sheriff sent an email throughout the Sheriff's Department that was a racially biased attack."

"My birth name was Max-Gustaf Edler. My father did not participate in raising me and so I took my mother's family name Huntsman as a law student with the help of a firm I clerked for. As Inspector General I have never used any name other than Max Huntsman, which is also my name on my driver's license and passport. A county computer system continues to incorrectly list my first name as Max-Gustaf and the sheriff has repeatedly referred to me as Max-Gustaf in public attacks. I believe this is dog whistling to the extremists he caters to as the more unusual name might lead some to view me as

Ask: "Why do you believe this treatment is occurring?" ( ☒ Check, if narrative is continued onto the next page)

Race \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



Section F (cont'd): Nature of the Complaint or Issue(s) -- Be as detailed as possible, include all incidents & evidence.

foreign (German or Jewish)."

(ISU Note: For details, refer to copy of CPOE complaint contained in ISU efile.)

\*\*\*\*\*

Note: Continue onto the next page

Section G: Supervisor -- FOR NON-VICTIM SUPERVISORY USE ONLY. DO NOT FILL OUT THIS SECTION IF YOU ARE THE ALLEGED VICTIM OR A NON-SUPERVISOR.

Date & Time notified of potential violation / observation was made: 03 / 16 / 2022, 1521 hours.

How did you become aware of the potential violation (explain in detail):  
The ISU received CPOE ICMS #2022-112213, containing the above allegations.

Supervisor's Actions (if any) (explain in detail)

A POE Report was generated by ISU Deputy Jonathan Lested to document the allegation in the County Policy of Equity

Complaint.

Did you ascertain whether complainant(s) and/or victim(s) are in need of:

- ☒ Medical Attention  
**Response:** to be ascertained
- ☒ Protection  
**Response:** to be ascertained
- ☒ Other Assistance  
**Response:** to be ascertained

Advised the complainant(s) and/or victim(s) that they:

- ☒ May seek confidential counseling or assistance from Employee Support Services

Notifications:

☐ **Intake Specialist Unit phone notification:** (During business hours, direct telephone (323) 890-5371. After hours, request through Sheriff's Headquarter's Bureau (323) 526-5541)

Intake Specialist notified via telephone: \_\_\_\_\_ Date & Time: \_\_\_\_ / \_\_\_\_ / \_\_\_\_\_, \_\_\_\_\_ hour.  
(Name)

☒ **POE Report/Notification Form forwarded to Intake Specialist Unit**

Date & Time: 03 / 16 / 2022, 1521 hour. How?: ☒ e-mail ☐ Fax ☐ County mail

\*\*\*\*\*

Section H: **For Intake Specialist Unit Use Only** - DO NOT FILL OUT IF YOU ARE REPORTING A POTENTIAL VIOLATION TO THE INTAKE SPECIALIST UNIT.

Intake Specialist Name: B-1 Deputy Jonathan A. Lested Emp. #: 467422

Day, Date and time ISU received form Thursday / 03 / 17 / 2022 , 1215 hours.

☐ Referred to Equity Unit: Date & Time - \_\_\_\_ / \_\_\_\_ / \_\_\_\_ , \_\_\_\_ hours.

☒ If not referred to Equity Unit, explain in detail action taken:

"B" assessment authored by DCO Sieberg received on 04/07/2022.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Additional Information (if any): \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- ☐ Check here if this violation has already been reported. If so, this form should be attached to the already existing report as an addendum. If the existing report has already been forwarded to the Equity Unit or any other Department entity, this form should be forwarded as well.

CC:

- ☒ Equity Oversight Panel  
☐ Subject's Unit Commander  
☐ Reporting Party's Unit Commander  
☐ Victim's Unit Commander

# EXHIBIT C

CONFIDENTIAL

COLA002109

EXHIBIT 38 - Page 666





**IV 2558097  
EXHIBIT C**



# MISCELLANEOUS DOCUMENTS

SH-AD-703 Revised (2/22)

COUNTY OF LOS ANGELES  
**SHERIFF'S DEPARTMENT**  
*"A Tradition of Service Since 1850"*

DATE: June 27, 2022

FILE NO:

OFFICE CORRESPONDENCE

**FROM:** JASON P. WOLAK, COMMANDER  
PROFESSIONAL STANDARDS DIV.

**TO:** RON KOPPERUD, CAPTAIN  
INTERNAL AFFAIRS BUREAU

**SUBJECT: REQUEST FOR** INTERNAL AFFAIRS BUREAU ADMINISTRATIVE INVESTIGATION

Incident Date(s): (use semi-colons to separate multiple dates)

Between March 5, 2022, and March22, 2022

Synopsis:

POE 22-045. It is alleged that Subject Villanueva acted in an inappropriate POE related manner while in the workplace.

Date a Sergeant, or above, became aware of an act, omission, or other misconduct:  
March 16, 2022

One Year Statute Date (If criminal monitor, leave blank): March 15, 2023

Alcohol Related? NO

Citizen Complaint? NO

If yes, SCR #:

Complainant's Name (Add employee number if a Department member)

Max Huntsman, Office of Inspector General, #410745

**CONFIDENTIAL****COLA002112**

EXHIBIT 38 - Page 669



## REQUEST FOR IAB INVESTIGATION AND/OR CRIMINAL MONITOR

**Involved Subject** (For additional subjects, use Subject Continuation Page 703-A)

**Subject Name, Rank, Employee Number, and Unit of Assignment:**

Alex Villanueva, Sheriff, #246296, Office of the Sheriff

**Potential MPP Violation(s):**

3-01/121.10 - POE Discrimination; 3-01/121.20 - POE Harassment Other than Sexual;  
3-01/121.25 POE Third Party Harassment;  
3-01/121.30 POE Inappropriate Conduct Toward Others

**Subject's Assignment/Duty Status:**

- ☒ Subject's assignment/duty status unchanged  
☐ Relieved of Duty (ROD), assigned to home ROD Date:  
☐ ROD, assigned to a relieved of duty position  
☐ Probationary Employee

**Justification for the subject's assignment/duty status (required):**

N/A

**Consideration(s) for IAB Request:**

\* Mandatory IAB Investigation

- ☐ Witnesses are spread over a large geographic area.  
☐ The nature of the allegation(s) involves incidents of high media attention.  
☐ A subject is a supervisor or manager (lieutenant or above; assistant director or above).  
☐ The nature of the allegation(s), if founded, will likely result in discharge.\*  
☐ The allegation(s) concern family/domestic violence.  
☐ The allegation(s) concern workplace violence.\*  
☐ The allegation(s) concern profiling or bias against members of the public.\*  
☒ Other: Allegations contain Policy of Equality\*

- ☐ Criminal Monitor by IAB (Refer to MPP 3-04/020.30 – Internal Administrative and Criminal Investigations) *enter investigating agency, crime, and report number.*

Supervisory Inquiry authored? ☐ Yes ☒ No

Contact person for source documents (i.e.: supervisory inquiry and/or investigative materials) at the requesting unit:

Prepared by Unit Commander/Director, or designee:

Lieutenant John Carter, #435532, Internal Affairs Bureau

**NOTE:** Email this form to "IAB Investigation Requests." A review of this request will be conducted by the Internal Affairs Bureau. There may be situations when the Internal Affairs Bureau will decide, upon initial review, to return the case to be conducted as a unit level investigation.

**For IAB use only**

Assigning Lieutenant Lieutenant John Carter, #435532

IAB Investigator Christine Diaz-Herrera, Esquire, Sanders Roberts LLP



COUNTY OF LOS ANGELES  
**SHERIFF'S DEPARTMENT**  
"A Tradition of Service Since 1850"

DATE: June 27, 2022

IV NO: 2558097

OFFICE CORRESPONDENCE

FROM:

EDWIN A. ALVAREZ, CHIEF  
PROFESSIONAL STANDARDS DIVISION

TO:

RON KOPPERUD, CAPTAIN  
INTERNAL AFFAIRS BUREAU**SUBJECT: SUBJECT OF ADMINISTRATIVE INVESTIGATION NOTIFICATION**

SUBJECT EMPLOYEE NAME, RANK, AND EMPLOYEE NUMBER:

Alex Villanueva, Sheriff, #246296

Department Knowledge Date (The date a sergeant, or above, became aware of an act, omission, or other misconduct):

03/16/2022

Potential MPP Violation(s) including, but not limited to:

3-01/121.10 POE - DISCRIMINATION  
3-01/121.20 POE - DISCRIMINATORY HARASSMENT (OTHER THAN SEXUAL)  
3-01/121.25 POE - THIRD PERSON HARASSMENT  
3-01/121.35 POE - RETALIATION

Nature of the investigation (general description):

It is alleged you acted in an inappropriate POE related manner and in the workplace.

You are advised that the authorization given by your Unit Commander to other supervisors to approve your routine absence requests has been rescinded. You are being ordered by your Unit Commander that during the time this investigation is active, any routine absence request must be submitted directly to him/her, and approval or denial of the request must come directly from them as well. You are additionally reminded of your responsibilities in submitting absence requests under **MPP 3-02/030.05 - ROUTINE ABSENCES**.

**SUBJECT EMPLOYEE ACKNOWLEDGEMENT OF NOTIFICATION:**Subject: [Signature]Witness: [Signature]

Employee #:

246296

Date:

6/29/22

Employee #:

410429

Date:

6/29/22

CONFIDENTIAL

COLA002114

EXHIBIT 38 - Page 671

---

Manual of Policy and Procedures : 3-01/121.10 - Policy of Equality - Discrimination

---

### **3-01/121.10 - Policy of Equality - Discrimination**

Discrimination is the disparate or adverse treatment of an individual based on or because of that individual's:

- Age (40 and over);
- Ancestry;
- Color;
- Denial of family and medical care leave;
- Disability (physical and mental, including HIV and AIDS);
- Ethnicity;
- Gender identity/gender expression;
- Genetic information;
- Marital status;
- Medical condition (genetic characteristics, cancer, or a record or history of cancer);
- Military or veteran status;
- National origin (including language use restrictions);
- Race;
- Religion (includes religious dress and grooming practices);
- Sex/gender (includes pregnancy, childbirth, breastfeeding, and/or related medical conditions);
- Sexual orientation; and
- Any other characteristic protected by state or federal law.

**Revised: 11/20/2020**

---

Manual of Policy and Procedures : 3-01/121.20 - Policy of Equality - Harassment (Other  
Than Sexual)

---

### **3-01/121.20 - Policy of Equality - Harassment (Other Than Sexual)**

Harassment of an individual based on or because of the individual's protected characteristic is also discrimination and prohibited. Harassment is conduct which has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, offensive, or abusive work environment, and a reasonable person subjected to the conduct would find that the harassment so altered working conditions as to make it more difficult to do the job.

**Revised: 11/20/2020**

---



Manual of Policy and Procedures : 3-01/121.25 - Policy of Equality - Third-Person  
Harassment

---

### **3-01/121.25 - Policy of Equality - Third-Person Harassment**

Third person harassment is indirect harassment of a bystander, even if the person engaging in the conduct is unaware of the presence of the bystander. When an individual engages in potentially harassing behavior, they assumes the risk that someone may pass by or otherwise witness the behavior. The Department considers this to be the same as directing the harassment toward that individual.

**Revised: 11/20/2020**

---

Manual of Policy and Procedures : 3-01/121.30 - Policy of Equality - Inappropriate  
Conduct Toward Others

---

### **3-01/121.30 - Policy of Equality - Inappropriate Conduct Toward Others**

Inappropriate conduct toward others is any physical, verbal, or visual conduct based on or because of any of the protected characteristics described in this policy, when such conduct reasonably would be considered inappropriate for the workplace.

This provision is intended to stop inappropriate conduct based on a protected characteristic before it becomes discrimination, sexual harassment, retaliation, or harassment under this policy. As such, the conduct need not meet legally actionable state and/or federal standards to violate this policy. An isolated derogatory comment, joke, racial slur, sexual innuendo, etc., may constitute conduct that violates this policy and be grounds for discipline. Similarly, the conduct need not be unwelcome to the party against whom it is directed; if the conduct reasonably would be considered inappropriate by the Department for the workplace, it will violate this policy.

**Revised: 11/20/2020**

---



**CONFIDENTIAL**

**COLA002119**

EXHIBIT 38 - Page 676

# EXHIBIT 39

# INVESTIGATOR'S LOG

<b>FILE NUMBER:</b>		IV 2558097
<b>INVESTIGATOR:</b>		Sanders Roberts LLP
<b>DATE DEPARTMENT BECAME AWARE OF ALLEGATION(S):</b>		03/16/2022
<b>DATE IAB INVESTIGATION INITIATED:</b>		06/27/2023
<b>DATE SENT TO ADVOCACY UNIT:</b>		
<b>DATE RETURNED FROM ADVOCACY UNIT:</b>		
<b>DATE FORWARDED TO FORCE OR RISK REVIEW:</b>		
<b>DATE RETURNED FROM FORCE OR RISK REVIEW:</b>		
<b>DATE TO DIVISION:</b>		
<b>DATE RETURNED TO IAB:</b>		
<b>CASE SUMMARY:</b>		
<b>DATE</b>	<b>SUMMARY</b>	<b>NAME</b>
06/22/22	Attorney Client Privilege	Lt. Carter
06/23/22	Attorney Client Privilege	Lt. Carter
06/24/22	Commander Wolak called and informed me to handle this matter in the same fashion as the previous involved Sheriff cases.	Lt. Carter
07/07/2022	Per Ms. Real, hard case delivered to Ms. Diaz Herrera's office	Lt. Carter
08/03/22	Emailed Ms. Diaz Herrera for an update.	Lt. Carter
10/03/22	Sent email to Ms. Diaz Herrera re: case status.	Lt. Carter
10/13/22	All interviews have been completed, except for the Sheriff. Will attempt to schedule a date by 10/14/22.	Lt. Carter
11/02/22	Sent email to Ms. Diaz Herrera re: case status.	Lt. Carter
11/07/22	Re-inquired about case status.	Lt. Carter
11/14/22	Completed all the interviews necessary for the Huntsman matter, with exception of Sheriff Villanueva. She has reached out to Commander Satterfield to sched Sheriff Villanueva's interview. She does not have a date sched for the interview yet.	Lt. Carter
11/30/22	I sent Commander Satterfield and Capt. Blanchard an email	Lt. Carter



## INVESTIGATOR'S LOG

	asking them to contact the attorney in order to set up an interview with Sheriff Villanueva.	
11/30/22	Commander Satterfield and Capt Blanchard called and informed me that they never received any requests for interviews for Sheriff Villanueva.	Lt. Carter
12/13/22	Sent email to Ms. Diaz Herrera regarding update.	Lt. Carter
01/04/23	Certified letter sent requesting an interview with the subject, Villanueva.	Lt. Carter
01/09/23	Former Sheriff Villanueva contacted the attorney.	Lt. Carter
01/12/23	Attorney Client Privilege	Lt. Carter
02/02/23	Sent an email requesting a case status.	Lt. Carter
02/21/23	Sent another email, no response.	Lt. Carter
03/05/23	Sent a 3 <sup>rd</sup> email requesting an update.	Lt. Carter
03/09/23	Ms. Diaz Herrera responded. Villanueva is not cooperating. Attorney Client Privilege	Lt. Carter
03/09/23	Briefed Chief Lecrivain and are moving forward with the case.	Lt. Carter
04/03/23	Per Ms. Diaz-Herrera, she advised Shawn Thomas was reassigned all 4 cases.	Lt. Carter
04/18/23	Sent email to new council Shawn Thomas regarding an update.	Lt. Carter
04/19/23	Received update- Outside counsel have undertaken to draft a final report using interview and relevant evidence.	Lt. Carter
05/15/23	Attorney Shawn Thomas sent an email stating he would send the Hunstman case back to IAB this week.	Lt. Carter
06/14/23	Emailed Mr. Thomas regarding 4 POE cases. 2 cases (Huntsman, Lim) are ready for pick up. IAB LET and Risk Management LET not available until next Tuesday (6/27/23).	Lt. Carter
07/05/23	Lt. Ann Devane took over the POE team, Lt. John Carter explained the process of reviewing, completing and stacking the case.	Lt. Devane
08/16/23	Reviewed zoom interview with Complainant Huntsman	Lt. Devane
08/24/23	Converted zoom interview to wave file to send out and have the interview transcribed	Lt. Devane
08/28/23	Received transcripts	Lt. Devane

## INVESTIGATOR'S LOG

09/12/23	Worked on completing required documents to stack the case	Lt. Devane
09/21/23	Reviewed transcripts and compared to the summary written by Saunders Roberts LLP, and confirmed the statements made by Complainant Huntsman were all documented in the summary.	Lt. Devane
09/26/23	Requested Subject Villanueva's training record and copy of Policy of Equality notification form, unable to locate either, per IAB Secretary V.	Lt. Devane
09/26/23	Stacked case and submitted to IAB Captain Kopperud for review.	Lt. Devane
10-2-23	Reviewed - Approved.	R Kopperud

# EXHIBIT 40



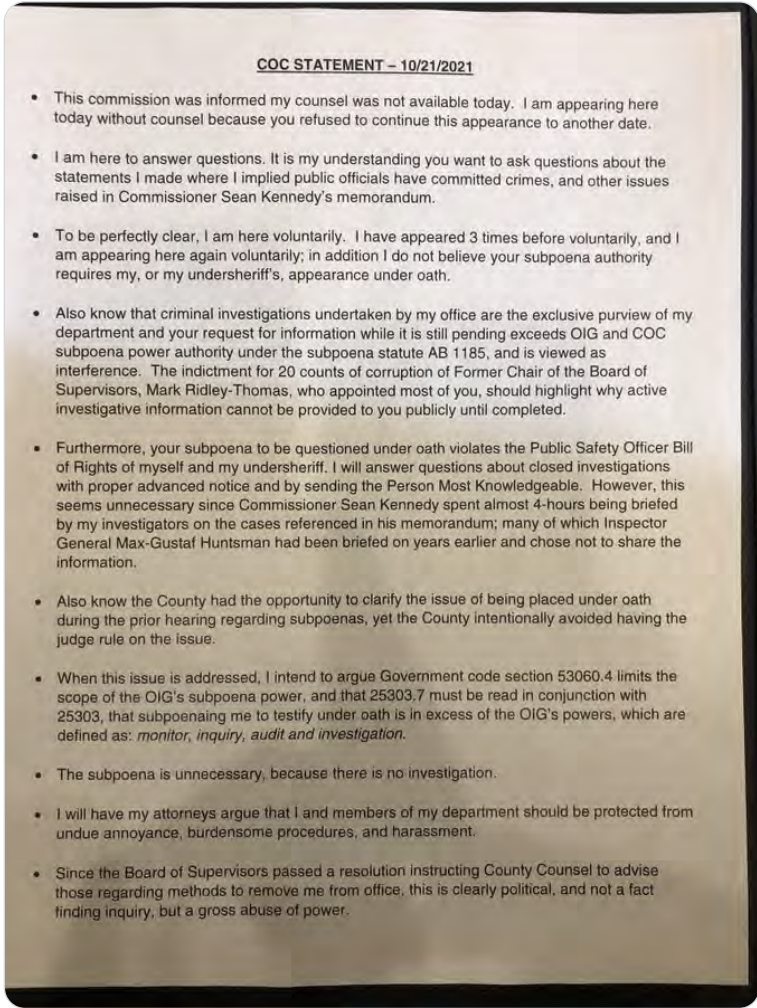
Alex Villanueva

@LACoSheriff\_33

...

(1/11) Although I waited 1hr 20min to speak with COC today, I was unable. Please read my statement:






This commission was informed my legal counsel was not available today. I am appearing here today without counsel because you refused to continue this appearance to another date.




10:49 AM · Oct 21, 2021

←


Thread





Tweet your reply!

Reply




Alex Villanueva @LACoSheriff\_33 · Oct 21, 2021

(2/11) I am here to answer questions. It is my understanding you want to ask questions about the statements I made where I implied public officials have committed crimes, and other issues raised in Commissioner Sean Kennedy's inaccurate memorandum.

2

3

16




Alex Villanueva @LACoSheriff\_33 · Oct 21, 2021

(3/11) To be perfectly clear, I am here voluntarily. I have appeared 3 times before voluntarily, and I am appearing here again voluntarily; in addition I do not believe your subpoena authority requires my, or my undersheriff's, appearance under oath.

1

4

15




Alex Villanueva @LACoSheriff\_33 · Oct 21, 2021

(4/11) Also know that criminal investigations undertaken by my office are the exclusive purview of my department and your request for information while it is still pending exceeds OIG and COC subpoena power authority under the subpoena statute AB 1185, and is interference.

1

2

16



Alex Villanueva @LACoSheriff\_33 · Oct 21, 2021

(5/11) The indictment for 20 counts of corruption of Former Chair of the Board of Supervisors, Mark Ridley-Thomas, who appointed most of you, should highlight why active investigative information cannot be provided

Relevant people



Alex Villanueva

@LACoSheriff\_33

Follow


This is an archive account of the 33rd Sheriff of Los Angeles County. Account maintained by LASD Sheriff's Information Bureau (SIB).

to you publicly until completed.

3

4

19



Alex Villanueva @LACoSheriff\_33 · Oct 21, 2021


...

(6/11) Furthermore, your subpoena to be questioned under oath violates the Public Safety Officer Bill of Rights of myself and my undersheriff. I will answer questions about closed investigations with proper advanced notice and by sending the Person Most Knowledgeable.

1

3

18



Alex Villanueva @LACoSheriff\_33 · Oct 21, 2021


...

(7/11) However, this seems unnecessary since Commissioner Sean Kennedy spent almost 4-hours being briefed by my investigators on the cases in his memorandum; many of which IG Max-Gustaf Huntsman had been briefed on years earlier and chose not to share the information.

1

3

14



Alex Villanueva @LACoSheriff\_33 · Oct 21, 2021


...

(8/11) Also know the County had the opportunity to clarify the issue of being placed under oath during the prior hearing regarding subpoenas, yet the County intentionally avoided having the judge rule on the issue.

1

2

13



Alex Villanueva @LACoSheriff\_33 · Oct 21, 2021


...

(9/11) When this issue is addressed, I will argue Government code section 53060.4 limits the scope of the OIG's subpoena power, & 25303.7 must be read in conjunction with 25303, that subpoenaing under oath is in excess of the OIG's powers: monitor, inquire, audit & investigate.

3

2

14



Alex Villanueva @LACoSheriff\_33 · Oct 21, 2021


...

(10/11) The subpoena is unnecessary, because there is no investigation. I will have my attorneys argue that I and members of my department should be protected from undue annoyance, burdensome procedures, and harassment.

5

5

29



Alex Villanueva @LACoSheriff\_33 · Oct 21, 2021

...

(11/11) Since the Board of Supervisors passed a resolution instructing County Counsel to advise them regarding methods to remove me from office, this is clearly political, and not a fact finding inquiry, but a gross abuse of power.

21

4

39

Relevant people



Alex Villanueva

@LACoSheriff\_33

Follow

This is an archive account of the 33rd Sheriff of Los Angeles County. Account maintained by LASD Sheriff's Information Bureau (SIB).

COLA000002

EXHIBIT 40 - Page 683

# EXHIBIT 41

← **Tweet**



**Alex Villanueva**  
@LACoSheriff\_33

...

Once again, we have received unproven allegations alleging “deputy gangs” by Inspector General Max-Gustav Huntsman. Sheriff Alex Villanueva remains committed to transparency and accountability. #lasd @LACoSheriff

Report any evidence of misconduct at:  
[lasd.org/report-employee...](https://lasd.org/report-employee...)



5:05 PM · Mar 22, 2022

# **EXHIBIT 42**

**(SEPARATELY LODGED WITH COURT)**



**NATIVE DOCUMENT PLACEHOLDER**

**Please review the native document COLA000020.mp4**

**COLA000020**

# **EXHIBIT43**

**(SEPARATELY LODGED WITH COURT)**

**NATIVE DOCUMENT PLACEHOLDER**

**Please review the native document COLA000021.mp4**

**COLA000021**

# **EXHIBIT 44**

**(SEPARATELY LODGED WITH COURT)**

**NATIVE DOCUMENT PLACEHOLDER**

**Please review the native document COLA000022.mp4**

**COLA000022**

# **EXHIBIT 45**

**(SEPARATELY LODGED WITH COURT)**

**NATIVE DOCUMENT PLACEHOLDER**

**Please review the native document COLA000023.mp4**

**COLA000023**

# **EXHIBIT 46**

**(SEPARATELY LODGED WITH COURT)**



## **NATIVE DOCUMENT PLACEHOLDER**

**Please review the native document COLA000024.mp4**

**COLA000024**

# EXHIBIT 47

---

**From:** Sheriff Department Announcement <[sheriffdeptannouncement@lasd.org](mailto:sheriffdeptannouncement@lasd.org)>

**Sent:** Saturday, March 5, 2022 2:24 PM

**To:** Exch\_User\_Group <[all\\_sdn\\_users@lasd.org](mailto:all_sdn_users@lasd.org)>

**Subject:** MESSAGE FROM THE SHERIFF: TRANSPARENCY AND ACCOUNTABILITY\*\*\*\*\*



## MESSAGE FROM THE SHERIFF

The Sheriff's Department's social media accounts are a primary tool to communicate with the public directly, without the often-biased filters of traditional news sources. Our Twitter, Facebook, and Instagram accounts provide accurate, relevant information on matters that are of concern to the community and department members. We post both the good and the bad that impacts our department's operations, and we do NOT censor bad news. To do so would turn us into a discredited propaganda machine.

Since I've taken office, we've made a concerted effort to improve our transparency and accountability. Striking a balance between supporting the actions of our personnel and holding them accountable to the rule of law is no easy task.

Any suggestion that posting news about the arraignment of one of our own is driven by politics is sadly misguided. On Tuesday, March 1st, the corrupt Inspector General, Max-Gustaf Huntsman, told the Board of Supervisors that I've dismantled the discipline system within the department, without providing a shred of evidence. This is a lie.

Every deputy involved shooting is tragic for all involved. Regardless of the circumstances of the incident, loved ones will grieve the loss of their family member. We grieve as well, for the deceased and for the deputies who were in harm's way, who will face scrutiny from those who have expressed open hostility to law enforcement and stand to gain financially by fanning the flames of hatred.

The political climate today, post George Floyd, has created a climate where the public expects immediate action against deputies whom they assume are guilty regardless of circumstances. My job is to support and defend deputies doing good work and hold accountable those who do not. I will ensure due process and fairness to all, but keep in mind this is 2022, not 1982.

As we continue to serve our community, remember these three rules: Do the right thing, do the best you can, and always show people you care! I appreciate the dedication, sacrifice, and hard work every member of this organization provides, and I am proud to lead you!

**ALEX VILLANUEVA**  
**SHERIFF**

# **EXHIBIT 48**

**(SEPARATELY LODGED WITH COURT)**

**NATIVE DOCUMENT PLACEHOLDER**

**Please review the native document COLA000018.mp3**

**COLA000018**

# **EXHIBIT 49**

**(SEPARATELY LODGED WITH COURT)**

**NATIVE DOCUMENT PLACEHOLDER**

**Please review the native document COLA000019.mp3**

**COLA000019**



# EXHIBIT 50

5/31/23, 2:40 PM

Editorial: Villanueva saga just gets odder, more destructive - Los Angeles Times



Los Angeles Times

SUBSCRIBE

LOG IN



OPINION

## Editorial: The Villanueva saga just gets odder and more destructive



L.A. County Sheriff Alex Villanueva said Inspector General Max Huntsman denies the Holocaust but gave no evidence. Huntsman called the claim untrue.

BY THE TIMES EDITORIAL BOARD

APRIL 1, 2022 11:01 AM PT

On Tuesday, Los Angeles County Sheriff Alex Villanueva [sent the Times editorial board a letter](#) explaining that he would “respectfully decline your invitation to participate in your editorial board’s endorsement process for sheriff” and “obviously will not be participating in any associated interviews.”

5/31/23, 2:40 PM

Editorial: Villanueva saga just gets odder, more destructive - Los Angeles Times

The letter, oddly, was received during our interview with him at 9 a.m., conducted via Zoom, as part of our endorsement process for the June election.

The interview itself was even odder, most notably for the out-of-nowhere, evidence-free assertion that county [Inspector General Max Huntsman](#) is a Holocaust denier.

Huntsman, in response to a Times editorial writer's question about Villanueva's accusation, said the allegation is completely false. "Of course the Holocaust was real," he said. He later sent the county Board of Supervisors a letter advising members of the conversation. The assertion is "such a deeply offensive allegation that I wanted you to hear from me that I have never denied the Holocaust," Huntsman wrote to the board.

---

We have been presented with absolutely no evidence that Huntsman, who is tasked with monitoring and overseeing the Sheriff's Department, is a Holocaust denier. The question this episode raises is about the sheriff: What kind of person — what kind of elected official and what kind of law enforcement officer — makes such a claim about someone and insists that he has proof but refuses to share it?

That's what Villanueva did. We had asked him what event precipitated a rift between him and the board early in his tenure, and he said it was his defeat of incumbent Sheriff Jim McDonnell in 2018, and then for whatever reason he added this non sequitur:

"You do realize that Max Huntsman, one, he's a Holocaust denier. I don't know if you're aware of that. I have it from two separate sources. And he filed a complaint against me because I refer to him as Max-Gustaf Huntsman, his actual legal name, that's on his

5/31/23, 2:40 PM

Editorial: Villanueva saga just gets odder, more destructive - Los Angeles Times

[State] Bar card. And he filed a complaint to the — I thought that was kind of humorous.”

The statement was so bizarre that we quickly moved on, but then came back to it. What evidence did he have?

“We have it from two very credible sources,” he said. “And I’m not going to divulge them at this time. But...you give a lot of credibility that he has a title, inspector general, and oh, my God, it sounds like so important and credible. But he’s just a political appointee from the board. Nothing more.”

---

But, an editorial board member pointed out, that’s different from being a Holocaust denier, which is what he just claimed. His response:

“There’s a lot you need to learn about. And I think you need to start doing your own homework on it.”

An editorial board member then asked why that’s our homework to do when he is the one who raised the issue and won’t back it up.

To which Villanueva answered: “Well, I think we have the information and in due time, we’ll release it. But I think you need to do your homework because you don’t.”

Villanueva’s primary task as a law enforcement officer is to collect facts and evidence and present them to prosecutors so courts can make rulings to protect public safety and mete out proper justice, but he seems unable to discern actual facts or evidence.



The baffling exchange pales in comparison with allegations being investigated against the sheriff and his department of [civil rights violations](#), [misconduct](#) and [abuse of deceased suspects' families](#), and his awful record of [financial mismanagement](#) and fecklessness in protecting public safety.

But it's a useful window into his character. He's the man who promised "truth and reconciliation" to people harmed by the Sheriff's Department, only to make clear later that promise was [meant only for deputies who had previously been fired](#) for misconduct.

He has accused the people assigned to oversee his department of [crimes](#) for doing their jobs, has created a unit to investigate his critics, has claimed credit for cracking down on wage theft while [apparently recovering only \\$450](#), has warned of [rising crime](#) while bragging that [crime is down](#). His lack of transparency over [fatal shootings by deputies](#) led to the [first L.A. County coroner inquests](#) in decades. His erratic behavior drew an [admonition from the cities that contract](#) for his department's law enforcement services, and a [demand from the Civilian Oversight Commission](#) that he resign. He inspired a [county ballot measure](#) and [state legislation](#) to give monitors [subpoena power](#) over him. The state attorney general opened a civil rights investigation against his department for patterns and practices of unconstitutional policing. Activists are [seeking county power to impeach him](#).

Villanueva's allegation against Huntsman sounds deranged, but it's deeper than that. He seems willing to say anything to smear an official who challenges his conduct in office. In any event, he is dishonorable and undeserving — of being sheriff or even of wearing a law enforcement uniform.

5/31/23, 2:40 PM

Editorial: Villanueva saga just gets odder, more destructive - Los Angeles Times

## The Times Editorial Board

The Los Angeles Times' editorial board determines the positions of The Times as an institution. It operates separately from the newsroom. You can read more about the board's mission and its members at [About The Times Editorial Board](#).

Copyright © 2023, Los Angeles Times | Terms of Service | Privacy Policy | CA Notice of Collection | Do Not Sell or Share My Personal Information

# EXHIBIT 51



Los Angeles Times

CALIFORNIA

## Sheriff Villanueva makes ugly, unfounded claim against county watchdog



L.A. County Sheriff Alex Villanueva said Inspector General Max Huntsman denies the Holocaust but gave no evidence. Huntsman called the claim untrue.

BY ALENE TCHEKMEDYIAN | STAFF WRITER

APRIL 1, 2022 UPDATED 1:17 PM PT

Since Los Angeles County Sheriff Alex Villanueva took office, Inspector General Max Huntsman has not hesitated to call out the sheriff for misconduct.

As the top watchdog of the Sheriff's Department, Huntsman has pushed back against Villanueva's resistance to his oversight, taking the sheriff to task for, among other things, refusing to [submit to subpoenas](#) he's issued for investigations into the

COLA000004

EXHIBIT 51 - Page 710



department, maintaining a [code of silence](#) about gang-like groups of deputies in his ranks and [stonewalling his office](#) on deputy shootings.

Villanueva, in turn, conducted a [criminal investigation](#) into Huntsman and has vilified him as a political tool of the county's Board of Supervisors. The sheriff has also lashed out at supervisors and members of the Sheriff Civilian Oversight Commission who, like Huntsman, have been highly critical of him.

---

But Villanueva took his attacks to a new level this week when he made an extraordinary accusation against Huntsman, claiming — without any evidence — that the inspector general is a Holocaust denier.

Villanueva made the comments during an interview Tuesday with the Los Angeles Times editorial board, which had invited him to participate in its endorsement process in the upcoming sheriff's race. The editorial board functions independently of The Times newsroom.

“You do realize that Max Huntsman, one, he's a Holocaust denier. I don't know if you're aware of that. I have it from two separate sources,” Villanueva told the board. When pressed for evidence, Villanueva refused to identify the purported sources, saying, “I think we have the information and in due time, we'll release it.”

---

The sheriff did not respond Friday morning when asked to explain his unfounded claim about Huntsman.

In a letter to the L.A. County Board of Supervisors, Huntsman said he had been contacted by a member of The Times editorial board regarding Villanueva's remarks, which he called untrue.

"The words are such a deeply offensive allegation that I wanted you to hear from me that I have never denied the Holocaust," Huntsman wrote.

The claim to The Times' editorial board was an explicit riff on more vague comments the sheriff has made about Huntsman. Villanueva has made it a point in the past to refer to Huntsman by his full name, Max-Gustaf Huntsman. And during an interview last month on KFI-AM, the sheriff said, "He's dropped the Gustaf for some reason, and there might be a story behind that, I understand is in the works."

---

In his letter to the Board of Supervisors, Huntsman wrote that Villanueva "is dog whistling to his more extreme supporters that I am German and/or Jewish and hence un-American" and then offered a personal family history.

Huntsman explained that his German father had developed a deep distrust of authority because he grew up during the Holocaust. He said his grandfather was conscripted into the Nazi army, but was not allowed to carry a rifle because he had previously employed Jews.

After the war, Huntsman wrote, his father came to the U.S., but abandoned the family shortly after Huntsman was born. "He gave me the name Max-Gustaf and so I do not

use it. I would never deny that the Holocaust happened nor do I begrudge that in some sense my mother and I have paid a small piece of the penance the human race owes for that sin.”

He pointed out that during Villanueva’s first year as sheriff, Villanueva’s son was hired as a deputy [despite posts on his Instagram](#) account making light of the Holocaust.

---

“The allegation comes from a man devoid of honesty and honor,” Huntsman wrote to the board. “So perhaps it goes without saying that such a claim is meaningless from him.”

The broadside from Villanueva was not the only odd part of his conversation with The Times editorial board. While he was meeting with the panel, its members [received a letter](#) from Villanueva’s reelection campaign claiming he would not participate in the paper’s endorsement process. After the meeting, the sheriff’s campaign team released the letter on social media with a message from Villanueva accusing The Times of working in concert with county officials to undermine him.

But the personal attack on Huntsman was a particularly ugly one in Villanueva’s long-running feud with the inspector general, which has been building since early in the sheriff’s term. It comes as Villanueva launches his reelection campaign and fits in to a broader campaign strategy of trying to vilify and discredit critics and journalists with ad-hominem, unsubstantiated attacks.

“This is yet another example where, instead of providing a vigorous defense for policy positions and practices, the sheriff is smearing yet another civil servant with whom he

disagrees,” said Brian Levin, executive director of the Center for the Study of Hate and Extremism at Cal State San Bernardino. “To accuse someone of being a Holocaust denier, if in fact it is false, opens up a potential defamation suit by the inspector general.”



Alene Tchekmedyan

Alene Tchekmedyan is an investigative reporter at the Los Angeles Times. She previously covered the Los Angeles County Sheriff’s Department, focusing on accountability stories and writing about failures by officials to comply with transparency laws. Before joining The Times in 2016, she reported on crime and policing for the Glendale News-Press and Burbank Leader.

Copyright © 2023, Los Angeles Times | Terms of Service | Privacy Policy | CA Notice of Collection | Do Not Sell or Share My Personal Information

# **EXHIBIT 52**

**(SEPARATELY LODGED WITH COURT)**



**NATIVE DOCUMENT PLACEHOLDER**

**Please review the native document COLA001762.mp4**

**COLA001762**

# EXHIBIT 53


SH-A.D-32A (3/23)

COUNTY OF LOS ANGELES  
**SHERIFF'S DEPARTMENT**  
*"A Tradition of Service Since 1850"*

DATE: October 17, 2023

FILE NO: IV 2558097

OFFICE CORRESPONDENCE

  
**FROM:** SERGIO V. ESCOBEDO  
ACTING COMMANDER  
PROFESSIONAL STANDARDS  
DIVISION

**TO:** COUNTY EQUITY  
OVERSIGHT PANEL

**SUBJECT:** POSSIBLE MANUAL OF POLICY AND PROCEDURES VIOLATIONS

The following Manual of Policy and Procedures violations relate to the allegations in this case, regarding **Alex Villanueva, Former Sheriff:**

**3-01/121.10 Policy of Equality – Discrimination (Based on National Origin and Ethnicity)**

Disposition:

☒ Charge founded  
☐ Charge unresolved  
☐ Charge unfounded  
☐ Charge exonerated

**3-01/121.20 Policy of Equality – Discriminatory Harassment (Based on National Origin and Ethnicity)**

Disposition:

☒ Charge founded  
☐ Charge unresolved  
☐ Charge unfounded  
☐ Charge exonerated

**3-01/121.25 Policy of Equality – Third Person Harassment (Based on National Origin and Ethnicity)**

Disposition:

☒ Charge founded  
☐ Charge unresolved  
☐ Charge unfounded  
☐ Charge exonerated



-2-

September 19, 2023

**3-01/121.30 Policy of Equality – Inappropriate Conduct Toward Others  
(Based on National Origin and Ethnicity)**

Disposition:

☒ Charge founded  
☐ Charge unresolved  
☐ Charge unfounded  
☐ Charge exonerated

**Discipline Assessment – Alex Villanueva, [REDACTED]**

**Review of Applicable “Guidelines for Discipline” Section:**

The Departmental “Guidelines for Discipline” (revised August 1, 2020) includes the Policy of Equality, and lists the following analogous misconduct with the associated disciplinary penalties:

CONDUCT	STANDARD DISCIPLINE
<b>3-01/121.10 Policy of Equality – Discrimination (Based on National Origin and Ethnicity)</b>	<b>Five (5) Days to Discharge</b>
<b>3-01/121.20 Policy of Equality – Discriminatory Harassment (Based on National Origin and Ethnicity)</b>	<b>Five (5) Days to Discharge</b>
<b>3-01/121.25 Policy of Equality – Third Person Harassment (Based on National Origin and Ethnicity)</b>	<b>Written Reprimand to Discharge</b>
<b>3-01/121.30 Policy of Equality – Inappropriate Conduct Toward Others (Based on National Origin and Ethnicity)</b>	<b>Written Reprimand to Discharge</b>

-3-

September 19, 2023

**Determination of Discipline:**

Based upon the attached assessment of mitigating and aggravating factors, the following discipline has been determined to be appropriate. This discipline is subject to revision upon receipt of the Subject's response or grievance.

- ☐ Discharge
- ☐ Reduction in Rank
- ☐ Removal from Bonus Position
- ☐ Suspension with loss of pay and benefits for \_\_\_ days with / without the option of EBD
- ☐ Written Reprimand
- ☐ No Discipline
- ☒ Panel Recommends "Do Not Rehire" notation at top of file

SVE:WB:wb


SH-AD-32A (3/23)

COUNTY OF LOS ANGELES  
**SHERIFF'S DEPARTMENT**  
*"A Tradition of Service Since 1850"*

DATE: October 17, 2023

FILE NO: IV 2558097

OFFICE CORRESPONDENCE

  
**FROM:** SERGIO V. ESCOBEDO  
ACTING COMMANDER  
PROFESSIONAL STANDARDS  
DIVISION

**TO:** COUNTY EQUITY  
OVERSIGHT PANEL

**SUBJECT:** Alex Villanueva, # [REDACTED]  
Former Sheriff  
Office of the Sheriff  
Executive Division

The County Equity Oversight Panel, consisting of Constance Komoroski, Mercedes Cruz and Roberta Yang met by teleconference on October 17, 2023. Also attending the teleconference was Department representative Chief Laura Lecrivain.

Upon consideration of the facts developed in this investigation, the Panel determined that the Manual of Policy and Procedures sections 3-01/121.10 Policy of Equality – *Discrimination (Based on National Origin and Ethnicity)*, 3-01/121.20 Policy of Equality – *Discriminatory Harassment (Based on National Origin and Ethnicity)*, 3-01/121.25 Policy of Equality – *Third Person Harassment (Based on National Origin and Ethnicity)*, and 3-01/121.30 Policy of Equality – *Inappropriate Conduct Toward Others (Based on National Origin and Ethnicity)* were **founded**.

The County Equity Oversight Panel recommended that the Subject should receive a **"Do Not Rehire"** notation at the top of their personnel file.

SVE:WB:wb

# EXHIBIT 54





# OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ALEX VILLANUEVA, SHERIFF



July 11, 2022

The Honorable Board of Supervisors  
County of Los Angeles  
383 Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

Dear Supervisors:

## **RESPONSE TO AGENDA ITEM #12 - PROMOTING ACCOUNTABILITY AND COMMUNITY SAFETY THROUGH CHECKS AND BALANCES OF THE LOS ANGELES COUNTY SHERIFF**

This motion is a continuation of the motion first initiated by former Supervisor Mark Ridley-Thomas, who has now been indicted on 20 counts of public corruption for alleged criminal acts committed while serving as the chair of this Board and awaits trial in November 2022. If passed, this unprecedented motion would allow corrupt Board members to intimidate sheriffs from carrying out their official duties to investigate crime.

As was the case with the last motion the Board placed on the ballot, Measure J, this measure will likely be ruled by the Courts to be unconstitutional. The fact the authors of this motion never sought an opinion from County Counsel or a constitutional law expert, regarding its constitutionality, speaks volumes as to the intent.

Currently there are four ways to remove a Sheriff from office: (1) elections, (2) recall elections, (3) convening a civil grand jury, or (4) using the authority already vested in the state attorney general, who has legal authority over all 58 sheriffs and district attorneys throughout the state. Your Board conveniently forgets to even mention number four (4).

This motion is a recipe for public corruption, particularly when "cause" remains so broad and undefined. Allowing political appointees with an agenda to determine "cause" is fundamentally flawed.

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1850 —

AV000001



The Honorable Board of Supervisors

-2-

July 11, 2022

This Board is attempting to cheat the system and create a "fast-track" pathway to remove a duly elected sheriff, one which circumvents the law and the foundational principles of due process enshrined in the Fourteenth Amendment of the United States Constitution. You are not, "putting it in the hands of the voters." You are putting it in the hands of political activists, the same political activists who wrote the basis for this motion and the same political activists whose mission is to abolish law enforcement and redirect the public safety budget to their own 501(c)3 non-governmental organizations.

Last week, the same day this motion was leaked to the media, over 715,000 signatures were delivered to recall current District Attorney George Gascon for not doing his job, exemplifying that with sufficient public support recalls are a viable tool. In direct opposition to this, your Board wants to grant yourselves the power to get rid of a sheriff with four votes, nullifying the will of ten million residents. As you know, each member of your Board represents approximately two million County residents, where I represent all ten million residents. In supporting this motion, you are removing checks and balances on each of your own power, thus shielding you from all accountabilities. This is unethical, self-serving, and a conflict of interest.

If this is truly needed, then follow the path San Bernardino County took and amend the motion to include all eight elected positions in Los Angeles County government (1-sheriff, 1-district attorney, 1-assessor, 5-board of supervisors). Show the public this is truly for accountability and not a cheap political stunt designed to influence an election, or retaliation against a sheriff who supported a successful district attorney recall initiative, or retaliation against a sheriff by a board member who currently is implicated in an active criminal investigation and has actively refused to comply with search warrants, or payback by a board member to activist groups for support during the last election.

This motion differs from the San Bernardino County ordinance language you cite as precedent because it does not include **all elected officials** as subject to removal. Your ordinance singles out only the elected sheriff, which will likely be suspect in the eyes of the court. Additionally, you cannot have oversight over the state functions of a sheriff, and your language clearly impedes a sheriff's state functions. Furthermore, this motion is premised on at least eight false statements.

The only precedent for such an ordinance is in the case of *Penrod v. County of San Bernardino (Penrod) (2005) 126 Cal. App. 4th 185*. The language of your ordinance resembles the one in San Bernardino, but has significant language changes from the one reviewed by the Court in the *Penrod* case. In *Penrod*, the court stated, "at some point, [should] the board impermissibly intrude on the sheriff's investigative and

AV000002



The Honorable Board of Supervisors

-3-

July 11, 2022

prosecutorial functions, such as happened in *Hicks v. Board of Supervisors* (1977) 69 Cal.App.3d 228, the sheriff can raise a challenge then."

The Court in *Penrod* further stated, the ordinance "empowers the board to remove the sheriff only for cause, including neglect of duties, misappropriation, legal wrongdoing and falsification. There may be circumstances about which we decline to speculate, when the board would need to act expeditiously to remove a corrupt county officer rather than wait for a grand jury to convene or a recall election to be held." Allowing the court to find later that if this ordinance is ever applied to a sheriff, it would be on the board to show: (1) what circumstance required removal, before a grand jury or a recall was completed, and (2) prove actual "cause" before removal of a sheriff. The court also did not rule out that a four-fifths board vote to remove the sheriff might also violate the **Public Safety Officers Procedural Bill of Rights Act (POBRA)**. These are all outstanding questions to be ruled on by the court.

It appears you are making yourselves the judge, jury, and executioner for the office of the sheriff, nullifying the will of the voters. This illegal motion seeks to undermine the role of the sheriff and render the office subordinate to the Board of Supervisors. On its face, your proposed ordinance language is not a proper reading of the law and will be challenged on these multiple grounds.

Lastly, I believe it is highly unethical for you to put this motion forward when this Board has already announced its public support for my opponent. It appears to me you are using your political offices to willfully affect the outcome of an election, also known as electioneering, and I ask you seek a legal opinion from County Counsel addressing these concerns, prior to a vote.

Should you have any questions or would like to discuss further, please feel free to contact my Chief of Staff, Commander John Satterfield, at [REDACTED].

Sincerely,



ALEX VILLANUEVA  
SHERIFF

AV000003

The Honorable Board of Supervisors

-4-

July 11, 2022

AV:JLS:ac  
(Office of the Sheriff)

c: Dawyn R. Harrison, Acting County Counsel, Office of the County Counsel  
James Wheeler, President, Association for Los Angeles Deputy Sheriffs  
(ALADS)  
Tab Rhodes, President, Professional Peace Officers Association (PPOA)  
Cesar Romero, President, Los Angeles Sheriff's Professional Association  
(LASPA)

AV000004



# EXHIBIT 55



# OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

**HALL OF JUSTICE**

ALEX VILLANUEVA, SHERIFF



September 21, 2022

The Honorable Rob Bonta  
The Attorney General of California  
California Department of Justice  
Post Office Box 944255  
Sacramento, California 94244-2550

Dear Attorney General Bonta:

## REQUEST FOR INVESTIGATION

In response to your correspondence dated September 20, 2022, I would like to thank you for accepting my request to open a criminal investigation for alleged public corruption by Los Angeles County Inspector General Max Huntsman and a member(s) of the Los Angeles County Counsel in the form of conspiracy to obstruct justice by notifying the suspect(s) of the service of our search warrant. As previously stated, the illegal acts allegedly committed by Mr. Huntsman and County Counsel have potentially compromised the integrity of this criminal investigation including, but not limited to, the concealment or destruction of evidence.

I would also like to thank you for now accepting our February 10, 2022, request for your active participation in the investigation of Peace Over Violence, Los Angeles Metropolitan Transit Authority, Patricia Giggans, and Los Angeles County Board of Supervisor, Sheila Kuehl, when Undersheriff Timothy Murakami wrote:

*I invite any of your deputy attorney generals, special agents, investigators, or other employees or representatives from your office to review, inspect, work alongside with, or participate in any meaningful manner with those sheriff's personnel assigned to the detail charged with these sensitive investigations. I can assure you they will be a welcome addition for their expertise and knowledge. Any accommodations needed for them to perform their functions will be met.*

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1850 —

Attorney General Bonta

-2-

September 21, 2022

*Nothing would please me more or better serve the ten million residents of this County than a joint law enforcement effort from both of our agencies dedicated to ensuring the honest delivery of services from public officials.*

As you noted in yesterday's letter, Chief Assistant Attorney General Lance Winters received quarterly updates on February 4, 2022, and August 23, 2022. Although it is many months later than our initial request, we appreciate your attention to this very serious public corruption investigation, which originated in September 2019, at the request of a whistleblower and an investigative news report.

As a gentle reminder, we have two other public corruption cases which have been submitted to your office in which we have not heard anything on since our last communication with Mr. Winters on January 25, 2022. For the record, those cases were:

- Possible criminal conduct by former Los Angeles County Chief Executive Officer Sachi Hamai.
- Possible criminal conduct by five individuals who purportedly engaged in acts to unlawfully obtain and distribute confidential, protected personnel records.

I look forward to fully cooperating and offering any assistance with this matter. Should you have any questions, please feel free to contact Undersheriff Timothy K. Murakami at [REDACTED]

Sincerely,



ALEX VILLANUEVA  
SHERIFF

# EXHIBIT 56





# OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ALEX VILLANUEVA, SHERIFF



September 21, 2022

The Honorable Board of Supervisors  
County of Los Angeles  
383 Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

Dear Supervisors:

**REQUEST FOR REMOVAL OF MAX HUNTSMAN AS INSPECTOR GENERAL  
RESULTING FROM ALLEGATIONS OF CONSPIRACY TO COMMITT  
OBSTRUCTION IN SEARCH WARRANT**

On February 18, 2021, in a six-page letter, I informed you of my *"grave concerns with the conduct of your appointed Inspector General, Max Huntsman."* I pointed out his *"zealot-like behavior which continues to create civil liability for the Los Angeles County."* I stated his, *"intellectual dishonesty places the public at an increased risk."* The letter ended with, *"I ask the Board to consider my concerns and replace the IG with one who is accredited, unbiased, and capable of maintaining a professional working relationship."*

As you were also aware at the time, Mr. Huntsman was a felony suspect in a theft of electronic information investigation, which remains an active investigation at the Office of the Attorney General. You had an opportunity to relieve Mr. Huntsman of his duties then, but declined and the Board ignored my request. Unfortunately, your failure to address the issues I pointed out to you in 2021, has now resulted in an even more serious crime allegedly occurring, which is additionally under active investigation by the Office of the Attorney General.

On September 14, 2022, as you are likely aware, public corruption search warrants were served at multiple locations. During the service at Supervisor Shelia Kuehl's residence, she stated to reporters, *"I heard from County Counsel last night that she got a tip from Max Huntsman that the search would happen this morning."* In the event you have not heard the statement for yourself, it was aired by every local news channel, and it is posted on all Los Angeles County Sheriff's Department's social media accounts.

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1850 —

The Honorable Board of Supervisors

-2-

September 21, 2022

Moreover, based on Supervisor Kuehl's statements and Attorney General Rob Bonta's announcement, Mr. Huntsman and the Los Angeles County Counsel have now become the focus of a criminal investigation by the Office of the Attorney General, and as such, the conflict of interest in Mr. Huntsman remaining in his current assignment is untenable. For these reasons, I demand that Mr. Huntsman be treated like any other of the over 100,000 Los Angeles County employees and be relieved of his duties, pending the outcome of the Attorney General's criminal investigation.

Given the above, it is the established pattern and practice everywhere in the Los Angeles County, by every department, that an employee is to be relieved of duty and/or reassigned upon reliable knowledge of alleged criminal activity, and an investigation is pending which could lead to termination.

Should you have any questions or would like to discuss further, please feel free to contact my Chief of Staff, John L. Satterfield, at [REDACTED].

Sincerely,

ALEX VILLANUEVA  
SHERIFF

# EXHIBIT 57



# OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ALEX VILLANUEVA, SHERIFF



October 5, 2022

The Honorable Board of Supervisors  
County of Los Angeles  
383 Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

Dear Supervisors:

## DEMAND TO RELIEVE SPECIFIED CONFIDENTIAL EMPLOYEES FROM THEIR DUTIES OF PUBLIC TRUST

Shortly after I was sworn into office on December 3, 2018, my staff alerted me to a series of illegal personnel file downloads that were launched by members of the Office of Inspector General and Constitutional Policing Advisors from the administration of Sheriff Jim McDonnell. This data breach appeared to have been initiated immediately following the primary election that was held in June 2018 and does not appear to have been done for a lawful reason. Former Sheriff McDonnell's staff had launched an inquiry into the matter, only to abandon it without proper resolution.

In early 2019, we initiated a criminal inquiry into the matter and consulted with representatives from the state Attorney General's office and the Federal Bureau of Investigation (FBI). Inspector General Max Huntsman's protestations were centered on his claims that he had permission from the incumbent to view my confidential personnel files. Our investigation indicates no such permission existed, either in writing or supported by the former sheriff, who refused to answer questions from our investigators. The investigation was turned over to the Attorney General's office in September 2021 for a prosecutorial decision. Please note this investigation names five suspects of criminal conspiracy to commit burglary and illegal removal of personnel files, among other charges.

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1850 —

AV010473



The Honorable Board of Supervisors

-2-

October 5, 2022

We have previously written to your office regarding the liability of permitting named felony suspects to continue working in their official capacity during the pendency of the criminal investigation. Now we have a whole new set of issues based on the extraordinary admissions from Supervisor Sheila Kuehl during the execution of search warrants by deputies assigned to our Public Corruption Unit. On live local television, Supervisor Kuehl claimed to have been alerted to the search warrants in advance by Acting County Counsel Dawyn Harrison, with information she received from Inspector General Max Huntsman. On September 21, 2022, I wrote to you listing the reasons why Mr. Huntsman needed to be relieved of his duties [Attachment A], and I have yet to receive a response.

In addition to Supervisor Kuehl's own public statements, court documents [Attachment B] reveal the names of two other individuals who alerted Supervisor Kuehl of the service of the warrant, in an apparent conspiracy to obstruct justice: Lisa Mandel, Chief of Staff, District 3, and Torie Osborn, Senior Strategist, District 3. As appointed officials who are considered confidential employees and trusted to maintain confidentiality over internal records and law enforcement operations, the alleged conduct of the four individuals referenced herein, and others who during the course of the Attorney General's investigation may also be identified, can no longer have access to Los Angeles County Sheriff's Department (Department) records, operations, or be involved in decision-making regarding oversight and/or legal representation.

Consistent with standard Department policy, Mr. Huntsman will be removed from all access to Department facilities, personnel, and databases effective immediately. This standard is applied to all Department personnel who are named as a suspect in a criminal case involving felony crimes. The list of potential charges Supervisor Kuehl and Commissioner Patricia Giggans include the following:

- California Government Code 1090, Conflict of Interest
- California Penal Code 165, Bribery of a public official or member of a board of supervisors
- California Penal Code 182.5, Conspiracy to obstruct justice
- California Penal Code 182, Conspiracy to commit any crime
- California Penal Code 503, Embezzlement
- California Penal Code 424, Theft, or misappropriation of public funds

The list of potential charges facing Mr. Huntsman, Ms. Harrison, Ms. Mandel, and Ms. Osborn include the following:

AV010474

The Honorable Board of Supervisors

-3-

October 5, 2022

- California Penal Code 182, Conspiracy to commit any crime
- California Penal Code 182.5, Conspiracy to obstruct justice
- California Penal Code 31, Aiding and abetting a crime
- California Penal Code 135, Destruction of evidence

There is no alternate universe where county counsel can dictate the manner in which the Department is represented in court, while they are actively involved in allegedly concealing criminal activity and obstructing the investigative function of the sheriff [California Government Code 25303]. To the contrary of taking corrective action, both Supervisor Kuehl and Supervisor Hilda Solis have made public statements on social media condemning both myself and the Department for the execution of a lawful public corruption search warrant that was properly vetted, approved by a judge, and reaffirmed by a second judge. Acting County Counsel Harrison is in no position to deny compensating the attorney of our choosing, who won for us in court, based on these extraordinary set of events [Attachment C]. Her apparent motive in denying counsel was to see the search warrant overturned by the court for lack of proper counsel. It is your moral and legal obligation to pick up the costs for *Werksman Jackson & Quinn LLP*. Please refer to Ms. Harrison's own words:

*"... I wanted to remind you that only the Office of County Counsel, or the law firms we retain, may represent you, in your official capacity, and the LASD... Therefore, you have no authority to retain your own counsel to represent either you or the LASD, nor is the County of Los Angeles responsible for any of the costs incurred by those law firms. I recently discovered that you improperly retained Werksman Jackson & Quinn LLP in this matter. I will notify them that they have no authority to represent you or LASD and will not be paid by the County of Los Angeles, and I will copy the Attorney General's Office."*

It is not the first time we have informed you of unethical and/or incompetent representation by county counsel and contract counsel that have had negative consequences to the Department. From failing to adequately present a defense in a high-profile civil lawsuit, failing to aggressively challenge false assertions in employee lawsuits, to colluding with the Civilian Oversight Commission and the Inspector General's office to give the false impression we are not complying with the submission of subpoenaed information or testimony. It is clear you have weaponized legal representation of the Department as another avenue to discredit my administration for your political interests. This comes at great expense to the taxpayer and to our credibility, which seems to be your goal.

AV010475

The Honorable Board of Supervisors

-4-

October 5, 2022

To be clear, the investigation is real, my authority is real, and so is that of the Attorney General who has now assumed responsibility for the investigation, which was initiated at our request. The investigation itself regarding *Peace Over Violence* was initiated based on a criminal complaint from a whistleblower, and contrary to false assertions by those involved, we do not investigate people, only allegations of criminal activity. This is true of every investigation initiated by the Department, including those by the Public Corruption Unit.

In closing, as a matter of reference, I wrote a whistleblower memorandum back in December of 2004 regarding the unfolding corrupt actions of then Division Chief Paul Tanaka [Attachment D]. As a young sergeant, I laid out publicly in detail my concerns regarding the unethical conduct and behavior of the administration of then Sheriff Lee Baca. I was laughed at, ridiculed, attacked, and had my career derailed for over a decade. The Board of Supervisors were informed of Baca and Tanaka's corruption, as were members of the Office of Independent Review, but it wasn't until the Citizen's Commission on Jail Violence and the FBI intervened, when the corruption began to halt. Needless to say, I stood my ground and was ultimately vindicated.

Today and again, I am standing my ground. You have two choices: circle the wagons and protect corruption or come clean and stand up for doing the right thing. Choose wisely, history will be your judge.

Should you have any questions or would like to discuss further, please feel free to contact my Chief of Staff, Commander John Satterfield at [REDACTED]

Sincerely,



ALEX VILLANUEVA  
SHERIFF

AV010476

The Honorable Board of Supervisors

-5-

October 5, 2022

AV:JLS:js

Attachments:      A – Letter for Removal of Max Huntsman  
                            B – Court Documents (Declaration)  
                            C – County Counsel Correspondence  
                            D – Letter to LASD Executives (2004)

AV010477

# **ATTACHMENT A**

AV010478

**OFFICE OF THE SHERIFF**

COUNTY OF LOS ANGELES

**HALL OF JUSTICE**

ALEX VILLANUEVA, SHERIFF



September 21, 2022

The Honorable Board of Supervisors  
County of Los Angeles  
383 Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

Dear Supervisors

**REQUEST FOR REMOVAL OF MAX HUNTSMAN AS INSPECTOR GENERAL  
RESULTING FROM ALLEGATIONS OF CONSPIRACY TO COMMIT  
OBSTRUCTION IN SEARCH WARRANT**

On February 18, 2021, in a six-page letter, I informed you of my *grave concerns with the conduct of your appointed Inspector General, Max Huntsman*. I pointed out his *zealot-like behavior which continues to create civil liability for the Los Angeles County*. I stated his, *intellectual dishonesty places the public at an increased risk*. The letter ended with, *I ask the Board to consider my concerns and replace the IG with one who is accredited, unbiased, and capable of maintaining a professional working relationship*.

As you were also aware at the time, Mr. Huntsman was a felony suspect in a theft of electronic information investigation, which remains an active investigation at the Office of the Attorney General. You had an opportunity to relieve Mr. Huntsman of his duties then, but declined and the Board ignored my request. Unfortunately, your failure to address the issues I pointed out to you in 2021, has now resulted in an even more serious crime allegedly occurring, which is additionally under active investigation by the Office of the Attorney General.

On September 14, 2022, as you are likely aware, public corruption search warrants were served at multiple locations. During the service at Supervisor Shelia Kuehl's residence, she stated to reporters, *"I heard from County Counsel last night that she got a tip from Max Huntsman that the search would happen this morning"*. In the event you have not heard the statement for yourself, it was aired by every local news channel, and it is posted on all Los Angeles County Sheriff's Department's social media accounts.

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1851 —

AV010479

The Honorable Board of Supervisors

-2-

September 21, 2022

Moreover, based on Supervisor Kuehl's statements and Attorney General Rob Bonta's announcement, Mr. Huntsman and the Los Angeles County Counsel have now become the focus of a criminal investigation by the Office of the Attorney General, and as such, the conflict of interest in Mr. Huntsman remaining in his current assignment is untenable. For these reasons, I demand that Mr. Huntsman be treated like any other of the over 100,000 Los Angeles County employees and be relieved of his duties, pending the outcome of the Attorney General's criminal investigation.

Given the above, it is the established pattern and practice everywhere in the Los Angeles County, by every department, that an employee is to be relieved of duty and/or reassigned upon reliable knowledge of alleged criminal activity, and an investigation is pending which could lead to termination.

Should you have any questions or would like to discuss further, please feel free to contact my Chief of Staff, John L. Satterfield, at [REDACTED]

Sincerely,

ALEX VILLANUEVA  
SHERIFF

AV010480

**ROB BONTA**  
*Attorney General*

*State of California*  
**DEPARTMENT OF JUSTICE**



1101 I Street  
P.O. Box 942266  
Sacramento, CA 95834-2566  
Telephone [REDACTED]  
E-Mail Address [REDACTED]

January 25, 2022

Timothy K. Murakami  
Undersheriff  
Office of the Sheriff  
County of Los Angeles  
Hall of Justice  
211 West Temple Street  
Los Angeles, CA 90012

VIA EMAIL AND U.S. MAIL

Re: Possible criminal conduct

Dear Undersheriff Murakami:

The Department of Justice (DOJ) is in receipt of your letters regarding possible criminal conduct. Specifically, we have received: (1) letters dated July 23, 2020, and October 20, 2021, regarding possible criminal conduct by Sachi Hamait; and (2) a letter dated November 16, 2021, regarding possible criminal conduct by five individuals who purportedly engaged in acts to "unlawfully obtain and distribute confidential, protected personnel records."

As to the former matter, you request that DOJ "conduct the criminal inquiry"; as to the latter, you implicitly request that DOJ conduct any necessary inquiry and review the matter, noting "the inherent conflict(s)" for further inquiry and asking that, should we decline "further inquiry or review," to refer the matter to a district attorney's office outside of Los Angeles County. DOJ will review these matters.

Additionally, it has come to our attention that your Office has been involved in a criminal investigation of Peace Over Violence and/or Executive Director Patti (Patricia) Giggans. Specifically, it has been reported that, in February and March 2021, your Office executed search warrants at the offices of Peace Over Violence and L.A. Metro as part of a criminal investigation. (E.g., Jason Henry, *LA County Sheriff Investigating Oversight Commissioner's Nonprofit, Search Warrants Show*, L.A. Daily News, June 18, 2021.)

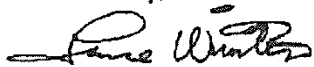
AV010481



January 25, 2022  
Page 2

DOJ requests that your Office to provide a report on the status of the investigation of Peace Over Violence and/or Executive Director Pani (Patricia) Giggans. (Cal. Const., art V, § 13 [noting Attorney General has supervisory authority over sheriff and may require "reports concerning the investigation, detection, prosecution, and punishment of crime"].) Your cooperation in this request is appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Lance Winters", with a stylized flourish at the end.

Lance Winters  
Chief Assistant Attorney General

For ROB BONTA  
Attorney General

AV010482



# OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

DEPT. OF JUSTICE

ALEX VILLANUEVA, SHERIFF



2014  
BOS

February 18, 2021

The Honorable Board of Supervisors  
County of Los Angeles  
383 Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

Dear Supervisors:

## THE NEED FOR AN HONEST AND OBJECTIVE INSPECTOR GENERAL

The purpose of this communication is to advise you of my grave concerns with the conduct of your appointed Inspector General (IG), Max-Gustaf Huntsman, and the publications authored by his office which directly influence the unsuspecting public's perceptions regarding both the credibility of the Los Angeles County Sheriff's Department (Department) and the legitimacy of our operations. His zealot-like behavior continues to create civil liability for the County and potentially endangers the life of deputies in the field, as he artificially stokes animosity between the Department and the community.

In addition to potentially endangering the lives of our deputies, his intellectual dishonesty places the public at an increased risk. After utilizing good communication and de-escalation strategies, deputies can only ultimately perform the detention or arrest of an individual one of two ways: 1) The person voluntarily submits to lawful authority; or, 2) The person resists and the deputy uses force to overcome their resistance and gain safe control. As the public continues to be misled by Mr. Huntsman as to the Department being engaged in widespread "unlawful conduct," they are far less likely to voluntarily comply. Statistically, this in and of itself places members of the public in situations that are far less likely to have a peaceful resolution.

The expectation of the public regarding the conduct of an IG is they are dedicated to serving the public's interest by working tirelessly to fairly assess the operations of any given organization and provide meaningful input for reforms, which may be required to adapt to an ever-changing world. Indeed, the National Association of Inspectors General posits this public expectation is best served when:

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*

REMOVED & E-MAILED TO BOS LAISON  
TEAM 2/18/21

AV010483

The Honorable Board of Supervisors

-2-

February 18, 2021

This public expectation is best served by inspectors general when they follow the basic principles of integrity, objectivity, independence, confidentiality, professionalism, competence, courage, trust, honesty, fairness, forthrightness, public accountability, and respect for others and themselves (AIG Principles and Standards, pg. 3, 2014).

Please note the first two principles outlined above, integrity and objectivity. I will provide you a brief rundown of the fundamental defects of Mr. Huntsman's work product, starting with the most recent publications and working our way back towards the start of my administration.

The Office of Inspector General (OIG) report "Review and Analysis of Misconduct Investigations and Disciplinary Process" released in February 2021 suffers from multiple fatal defects, chief among them the fallacy of a study period (2015-2019) which encompasses two administrations without distinguishing and contrasting the data from both. Another fatal flaw is the use of individual cases in an anecdotal fashion as representative of the entire Department's operation without providing proper context with the totality of cases investigated and discipline rendered. A select quote from the introduction:

Notwithstanding the current Sheriff's assertions, we were not provided by the Sheriff, and in our review, we did not observe or find, any evidence of falsification of evidence or reports which resulted in the wrongful discipline of a department employee (pg. 4, 2021).

This statement is demonstrably false and illustrative of the nature of the report itself. The Department conducted an in-depth analysis of the Mandoyan case, which is now a public document, wherein it was proven that a key exculpatory witness was identified, interviewed, and the results concealed from both the Civil Service Commission and the employee fighting the discharge (see the Department's Case Analysis, October 1, 2019).

The next production from the OIG, "Report Back on Unlawful Conduct of the Los Angeles County Sheriff's Department" was a letter dated December 14, 2020, addressed to the Civilian Oversight Commission (COC), purportedly in response to a request from Commissioner Priscilla Ocen. The starkly sophomoric report amounted to nothing more than a rehash of current and past litigation and a torturous defense of the legal fallout from Mr. Huntsman's oversteps in a homicide investigation.

This report was designed exclusively as a political tool to discredit the Department and does not appear to have any legitimate purpose in oversight, transparency, or accountability. Perhaps the most startling false statement is the section subtitled

AV010484

The Honorable Board of Supervisors

3.

February 18, 2021

"Failure to Investigate and Prohibit Deputy Secret Societies (pg 12). Mr. Huntsman has the Department's criminal and administrative investigations of the Kennedy Hall incident from former Sheriff Jim McDonnell's tenure, and he is aware that 26 employees were disciplined, including four who were terminated as a result of that administrative investigation. Mr. Huntsman is also aware of the Department's new policy regarding forming or participating in deputy subgroups, which was issued in February 2020 and is being vigorously enforced.

The preceding report, "The Right to Know Act: Los Angeles County Sheriff's Department Response to Police Transparency Reform" was published in November 2020, and in typical OIG fashion, deliberately used outdated information from January 2020 to make the false claim the Department was not complying with SB 1421. For the record, as of December 31, 2020, the Department achieved full compliance with SB 1421 with a 96.45 percent rate, a number Mr. Huntsman was well aware was in the making and far different than the 70 percent non-compliance rate he reported just a month earlier.

Mr. Huntsman is also aware of the issues the Department has had since the inception of SB 1421, with antiquated databases that do not communicate with each other and the severe lack of staffing to meet the new requirements (a failure of leadership by the previous administration). To wit, in a letter dated July 6, 2020, to former Board of Supervisors (BOS) Chair, Supervisor Kathryn Barger, the Department outlined six different occasions where we requested additional resources through the Chief Executive Office and were denied repeatedly. It was only through cannibalizing different functions of the Department that we were able to muster enough personnel to satisfy SB 1421 and California Privacy Rights Act requests. Comparing our operation to Los Angeles Police Department's is a dishonest comparison based on disparate funding levels, IT infrastructure, and staffing levels.

Looking through the sheer number of reports authored by the OIG, a persistent pattern emerges wherein the OIG ignores Department investigations, results of investigations, and actions taken in response to complaints from the public. The November 17, 2020 report back to the COC regarding the alleged harassment of family members after fatal deputy-involved shootings is one example of this. The report negates in its entirety the concerns of the public over impromptu memorials and gang members loitering in the vicinities of their homes, concerns which were addressed properly by the Department's report.

Examining the OIG's report's table of contents alone since its inception reveals a deferential OIG during former Sheriff McDonnell's administration, with report titles of a generic and non-inflammatory nature, unlike those published during my administration.

AV010485

The Honorable Board of Supervisors

-4-

February 18, 2021

As a matter of fact, the OIG generated as many reports during my first two years in office as they did during all of former Sheriff McDonnell's tenure, and that includes the conspicuously "confidential" report Mr. Huntsman prepared to bury the potentially illegal actions of former Sheriff McDonnell's Assistant Sheriff Mike Rothans for his purchase of a stolen vehicle from a contracted tow company.

Without question, these "reports" would be rejected by any legitimate academic institution. They are filled with unproven allegations, anecdotal data, omissions, distortions, and an overall permeation of bias and intellectual dishonesty. They are truly not the level of accuracy and authenticity expected in County government. Furthermore, if my own deputies consistently authored documents at this level, they would at the very least be placed on a performance improvement plan, and in cases of deception, omission, and lack of honesty, an administrative investigation would be conducted. I believe the responsibility for performance and accountability issues with Mr. Huntsman belongs, in part, to the COC. Yet, they seem too hyper-focused on political activism and calls for my own resignation to focus on this duty.

Since taking office in December 2018, I have continued my reforms within the Department to enhance public safety and strengthen the ties within our communities. As the elected Sheriff serving the most populous county in the nation and employing nearly 18,000 employees, this is no easy task. Having inherited significant problems from past administrations, I remain committed to effecting positive change for the residents of Los Angeles County.

As the first progressive democratic sheriff, I have delivered on many of my campaign promises to bring reform and transparency to the Department. I have instituted major reforms regarding Immigration and Customs Enforcement (ICE), leadership diversity, wage theft, and the single most important commitment to transparency – body worn cameras. Although Mr. Huntsman authored multiple reports on the Department's cooperation with ICE, he became silent in light of the moratorium on all inmate transfers to ICE custody. Again, this amounts to false documentation by omission and does not serve to inform either the public or the Department.

As a result of these unethical reports, the Department is suffering irreparable damage, and our standing in the community is being undermined by continual misleading and false attacks. It should be of great concern to all of us that his actions are eroding public trust and creating a liability for the Department. His hopelessly biased reporting will only invite future frivolous lawsuits which the hardworking taxpayers will have to waste money defending, while at the same time artificially rising tensions in the community which can endanger the lives of our deputies. This was clearly evidenced by the brutal attack on our two Compton Transit Services Bureau deputies which horrified the entire nation.

AV010486

The Honorable Board of Supervisors

-5-

February 18, 2021

The IG serves an advisory role, just like the CQC. When their efforts are driven by political agendas and not facts, they fail to serve the public's expectations of oversight and betray the reason for their existence. As a result, their work product does not inform the Department's operations and will not be considered of any value. The Department will continue, however, to provide both entities all the information they are legally entitled to receive.

As you have been advised in writing, the Department continues to investigate a data breach discovered at the beginning of 2019. The Legislature has enacted a statutory scheme defining the powers and duties of a sheriff (Government Code Sections 26800-26878). Section 26800 generally provides:

The sheriff shall preserve peace, and to accomplish this object may sponsor, supervise, or participate in any project of crime prevention, rehabilitation of persons previously convicted of a crime, or the suppression of delinquency.

A sheriff is also expressly authorized and directed to investigate public offenses that have been committed and to arrest and take before a magistrate all persons who have committed a public offense (Sections 26801-26802). There is no statutory scheme that places anyone, including members of the OIG, above the law. As such, it is with concern that I read a letter from Lawrence Middleton to County Counsel, who had retained him to purportedly provide legal guidance on this very issue. In his words:

Upon completing my analysis, I wanted to bring to Undersheriff Murakami's attention a number of issues and concerns that cause me to counsel against a continuation or escalation of the investigation. Most notably, as detailed below, because none of the potential charges being investigated are likely to lead to a successful criminal prosecution, Department personnel involved in the investigation could place themselves in jeopardy or criminal prosecution and/or civil liability if they continue (March 8, 2020).

This letter appears to be an attempt to intimidate, coerce, or otherwise dissuade the Department from carrying out our lawful duty and is unacceptable. It should be noted neither County Counsel nor Mr. Middleton has knowledge of the scope or details of the investigation, rendering such opinions ill-informed and ill-advised. I have recused myself from this inquiry and know of its details superficially.

The Department needs an IG who is not ethically compromised and is certified by the National Association of Inspectors General. I expect the work product of the OIG to adhere to professional standards as cited in the Association of Inspectors General's book, "Principles and Standards for Offices of Inspector General," also known as the Green Book. The public, the Department, and BOS all deserve accurate reporting

AV010487

The Honorable Board of Supervisors

6

February 18, 2021

which is not politically motivated. I ask the BOS to consider my concerns and replace the IG with one who is accredited, unbiased, and capable of maintaining a professional working relationship. The Department's reputation is being unfairly tarnished by the IG in his personal attacks towards us. We need an IG who is fair and objective, not inflammatory and controversial.

The Department is a national trendsetter on many important issues, such as the relationship between local law enforcement and federal immigration enforcement, combatting the spread of COVID-19 in congregate living facilities and super-spreader events, the Wage Theft Task Force, defending the community during periods of civil unrest, and transparency. Our efforts are often adopted as best practices by other law enforcement agencies throughout the nation. Our reputation is at stake. The IG's personal vendetta should not come at the expense of our dedicated employees who put their lives on the line each and every day in service to the community.

Should you have any questions or would like to discuss further, please feel free to contact me at [REDACTED]

Sincerely,

ALEX VILLANUEVA  
SHERIFF

AV010488

The Honorable Board of Supervisors

-7-

February 18, 2021

AV:JAV:ac  
(Office of the Sheriff)

c: Rodrigo A. Castro-Silva, County Counsel, Office of the County Counsel

AV010489



# **ATTACHMENT B**

AV010490

1 WERKSMAN JACKSON & QUINN LLP  
2 ALAN J. JACKSON (Bar No. 173647)  
3 CALEB E. MASON (Bar No. 246653)

4 888 W. 6<sup>th</sup> St. 4<sup>th</sup> Floor  
5 Los Angeles, California 90017

6 Attorneys for Los Angeles County Sheriff's Department

CONFORMED COPY  
ORIGINAL FILED  
Superior Court of California  
County of Los Angeles

SEP 22 2022

Shari R. Carter, Executive Officer/Clerk of Court  
By: Sheryl R. Humber, Deputy

7 SUPERIOR COURT OF CALIFORNIA  
8  
9 COUNTY OF LOS ANGELES - CENTRAL DISTRICT

10 IN RE: SEARCH WARRANT SERVED  
11 ON OFFICE OF THE INSPECTOR  
12 GENERAL FOR THE LOS ANGELES  
13 COUNTY METROPOLITAN  
14 TRANSPORTATION AUTHORITY ON  
15 SEPTEMBER 14, 2022

Case No.: Misc. BH014167

(Hon. William C. Ryan - Department  
56W)

DECLARATION OF MAX O.  
FERNANDEZ IN RESPONSE TO  
COURT'S ORDER DATED  
SEPTEMBER 20, 2022.

Date: September 22, 2022  
Time: 1:30 p.m.  
Dept.: 56W

19 DECLARATION OF SGT. MAX O. FERNANDEZ

20 I, Max O. Fernandez, declare as follows:

21 I. I am employed as a sergeant for the Los Angeles County Sheriff's  
22 Department ("LASD"). I am assigned as the lead investigator in the Department's  
23 investigation of related to possible criminal conduct regarding the awarding of contracts  
24 to Peace Over Violence (POV) by the Metropolitan Transportation Authority (MTA)  
25 ("the Matter"). I am the affiant for the search warrants relating to the Matter. There are  
26 two: one signed on February 26, 2021, by Judge Ronald Coen. I am also the Affiant for  
27 the Search Warrant which was signed on September 8, 2022 by Judge Craig Richman. I  
28

-1-

SUPPLEMENTAL DECLARATION OF SGT. MAX FERNANDEZ PURSUANT TO

AV010491

1 make this declaration from my own personal knowledge, and if called as a witness, I  
2 could and would testify competently to the facts stated below.

3 2. This Supplemental Declaration supplements my Declaration filed  
4 yesterday in this Matter. I make this Declaration in compliance with the Court's  
5 September 20, 2022 Order, to ensure that I have fully and completely addressed the  
6 questions raised by the Court. My prior Declaration addressed the Court's questions  
7 about the application for and issuance of the search warrants in this Matter. This  
8 Declaration provides additional information regarding Question No. 5: "Report what  
9 searches have already been conducted on any computer seized under the warrant, and  
10 who conducted the searches, and what information has been obtained."

11 3. I joined the LASD's Public Corruption unit in October 2020. This  
12 investigation was assigned to me on or about October 26, 2020. The investigation was  
13 opened a year before that, on or about September 11, 2019, when a whistleblower from  
14 the MTA contacted the LASD to report what she believed to be illegal conduct,  
15 including fraudulent conduct in directing contracts to politically connected individuals  
16 and entities; and retaliation against her for reporting same.

17 4. I have seen public statements reported in the media made by various public  
18 figures, alleging that this investigation is some sort of political payback by the Sheriff  
19 against Supervisor Kuehl because of recent political developments and disagreements.  
20 That allegation is false. I know that the allegation is false, because (1) I have worked on  
21 this investigation for two years, and the investigation was begun a year before that, in  
22 September 2019—long before the current political animosities developed; and most  
23 importantly (2) this investigation is based on provable facts, credible witness testimony,  
24 and an undisputed documentary record, that provides probable for the allegations that  
25 County contracts were improperly awarded to Ms. Giggans and POV. The full details of  
26 the investigation, including the evidence reviewed and witnesses interviewed, is set forth  
27 in the affidavit I presented to the court in support of the search warrants obtained in the  
28 Matter. That evidence is abundant and constitutes probable cause to believe that a crime

-2-

SUPPLEMENTAL DECLARATION OF SGT. MAX FERNANDEZ PURSUANT TO  
COURT'S ORDER DATED SEPTEMBER 20, 2022

AV010492

1 has been committed, in my professional opinion. This is a straightforward investigation  
2 of corruption in the expenditure of public funds—the sort of investigation that every law  
3 enforcement agency in the state conducts on a regular basis, and that prosecutorial  
4 agencies regularly prosecute. This investigation has been conducted throughout  
5 according to standard investigatory practices.

6 5. The full list of items seized during the searches of Supervisor Kuehl's and  
7 Ms. Giggans' residences is attached hereto as Exhibit 1. As noted in my previous  
8 Declaration (Paragraph 7), none of the materials seized in the search of the Office of  
9 Inspector General offices have been reviewed or imaged.

10 6. Exhibit 1 identifies each item, and states whether its contents were imaged.  
11 Items 20, 21, 22, 24, and 25 are paper records, and were not imaged. The technicians  
12 who worked on the imaging are: Thomas Ferguson; Leo Lo; John Moore; Steven  
13 Suarez; Mike Rivas; Julius Gomez; Raquel Gonzales; Claudia Iwasczyszyn; and Brian  
14 Moreno. Those technicians did not review the contents of any device.

15 7. In sum: none of the contents of any computer seized have been reviewed.  
16 Of the total of 67 devices seized, 49 have been imaged, and one (1) has been partially  
17 imaged. All the imaging was conducted on September 14, 15, and 16, 2022. None of  
18 the contents of any of the devices have been reviewed, except for a review of recent text  
19 messages and voicemails on Supervisor Kuehl's phones as set forth below.

20 8. The only devices from which any content has been reviewed are the two  
21 phones seized from Supervisor Kuehl, and the only content reviewed from those phones  
22 were approximately 250 text messages and two voice mails. I personally conducted that  
23 review on the morning of September 16, 2022. I considered that review to be urgent for  
24 the reasons set forth below.

25 9. The review of the text messages and voicemails on Supervisor Kuehl's  
26 phone in the period prior to the execution of the warrant was urgent because at 8:00 a.m.  
27 on September 14, 2022, while deputies were still at her premises, Supervisor Kuehl gave  
28 a live television interview to Fox 11 News, in which she said the following: "KUEHL: I

-3-

SUPPLEMENTAL DECLARATION OF SGT. MAX FERNANDEZ PURSUANT TO  
COURT'S ORDER DATED SEPTEMBER 20, 2022

AV010493

1 heard from County Counsel last night that she got a tip from Max that this search would  
2 happen. REPORTER: Max Huntsman? KUEHL: Yes, from Max Huntsman that this  
3 search would happen this morning."

4 10. In my professional opinion, and based on my training and experience,  
5 tipping off a target of a search warrant prior to the execution of the warrant is a crime.  
6 Penal Code section 148 prohibits obstructing officers in the execution of their duties,  
7 including serving search warrants; and Penal Code 168 prohibits public officials  
8 (prosecutors, judges, clerks, or peace officers) from disclosing the fact that a search  
9 warrant has been issued, prior to its execution, for the purpose of preventing the search  
10 or seizure of property. The only people who knew about the issuance of this search  
11 warrant when it was issued were among those enumerated categories. So, at a  
12 minimum, whoever told Max Huntsman about this warrant committed a crime.

13 11. In the concurrent search of Patricia Giggans' residence, which took place  
14 at the same time as the search of Supervisor Kuehl's residence, we were surprised to  
15 find that Ms. Giggans' phone was not present anywhere in the house or on her person.  
16 The search warrant was executed at 7 a.m. at Ms. Giggans' residence, and she was  
17 personally present when we arrived. Based on my training and experience, individuals  
18 keep their phones ready to hand, and I know that Ms. Giggans owns and uses an iPhone,  
19 because we have obtained numerous emails sent by her, which contain in the signature  
20 line the phrase, "Sent from my iPhone." I know from personal experience and from my  
21 training that that phrase is automatically inserted into emails sent from an iPhone. It is  
22 also not plausible or likely that Ms. Giggans would manually type that phrase into the  
23 bottom of every email she sends.

24 12. Because I know that Ms. Giggans has an iPhone, and her phone was not  
25 present in her residence or on her person, I concluded that the most likely explanation  
26 for the absence of her phone was that she was aware that the warrant was going to be  
27 executed, and she disposed of the phone in some manner beforehand. Ms. Giggans'  
28 attorney, Mr. Austin Dove, arrived at her residence approximately 15 minutes into the

1 search. Mr. Dove spoke with the detectives executing the warrant, and said the  
2 following: "There is no phone. You can search for the phone. You're entitled to search  
3 the place." That statement was made by Mr. Dove to Detective Yoon Nam, who told me  
4 about it that same day.

5 13. In addition to constituting a crime under the Penal Code, the act of tipping  
6 off a target of a search warrant to existence of the warrant is a major concern for the  
7 LASD. It creates safety and security risks for officers executing warrants, and it  
8 compromises and impairs the investigation of crimes. In short, we simply cannot have  
9 targets of warrants tipped off the night before. The fact that Supervisor Kuehl publicly  
10 stated she had been tipped off the night before was a serious concern for me and for the  
11 LASD, as to how the information had been obtained and disseminated.

12 14. Accordingly, I reviewed Ms. Kuehl's phones, looking for recent  
13 communications relating to the warrant. I found them. The relevant text messages are  
14 attached hereto as Exhibit 2.

15 15. At 10:17 p.m. on September 13, 2022, Lisa Mandel, Supervisor Kuehl's  
16 Chief of Staff, texted Supervisor Kuehl the following (the full message is attached in  
17 Exhibit 2): "Just got a call from Dawyn Harrison. She has been informed that the  
18 Sheriff may obtained a search warrant for your home and Pati G's.... Per the informant,  
19 the warrant is for 7 a.m. tomorrow. Let me know if you want me to do anything."

20 16. At 11:41 p.m. on September 13, 2022, Dawyn Harrison (who is Acting  
21 County Counsel) texted Supervisor Kuehl the following (the full message is attached in  
22 Exhibit 2): "Was the first my team heard of it. Max called CoCo tonight with his  
23 'intel.'" I know from personal experience and from my training that "CoCo" refers to  
24 County Counsel.

25 17. There are approximately 25 messages relating to the above two messages.  
26 And the two voicemails were from Ms. Harrison, also on the evening of September 13,  
27 2022. Both stated that she had an urgent matter that she needed to discuss with  
28 Supervisor Kuehl.

-5-

SUPPLEMENTAL DECLARATION OF SGT. MAX FERNANDEZ PURSUANT TO  
COURT'S ORDER DATED SEPTEMBER 20, 2022

AV010495

1 18. The other investigators who have reviewed the same set of text messages I  
2 reviewed from Supervisor Kuehl's phones are Detective Rafael Rafino and Lieutenant  
3 Oscar Veloz.

4 I declare under penalty of perjury under the laws of the State of California that  
5 the foregoing is true and correct.

6 Executed on September 21, 2022, in Los Angeles, California.

7   
8 MAX O. FERNANDEZ

## **EXHIBIT 1**

AV010497



CAT	ITEM #	QUAN	DESCRIPTION	DATE RECEIVED	IMAGED	PROCESSED	PORTABLE CASE	NOTES
EV	1	1	Computers, equipment, & accessories - [REDACTED] color, [REDACTED] with power cord; from Home Ofc Desk (LOC 6) Article: CABLE Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] DOJ File Control Number: [REDACTED] Booked At: OTHER	9/14/2022	Y	Y	N	
EV	2	1	Computers, equipment, & accessories - [REDACTED] Blk, w/cord; home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] DOJ File Control Number: [REDACTED] Booked At: OTHER	9/14/2022	N	N	N	No Data - Drive B/D
EV	3	1	Phones/Cell - Blk [REDACTED] blk/gry case (cracked screen protector), IEMI [REDACTED]: Master BR (LOC 6) Article: Cell Phone Make: [REDACTED] Model: Unknown Serial Number: Unknown Booked At: OTHER	9/14/2022	N	N	N	No Extraction

A/V010498

EV	4	1	Computers, equipment, & accessories - Silv USB "Homeboy Industries"; center drawer of home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Not Applicable Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/14/2022	Y	N	N	No Data in Date Range
EV	5	1	Computers, equipment, & accessories - Blu USB "[REDACTED]"; Top LT drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Not Applicable Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/14/2022	Y	Y	Y	
EV	6	1	Computers, equipment, & accessories - Blk/Silv USB "[REDACTED]"; Top LT drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Unknown Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/14/2022	Y	N	N	No Data in Date Range
EV	7	1	Computers, equipment, & accessories - Blk/Silv USB "[REDACTED]"; Top LT drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Unknown Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/14/2022	Y	N	N	

AV010499

EV	8	1	Computers, equipment, & accessories - Silv/Wht USB "Futures without violence"; LT middle drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Unknown Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/14/2022	Y	N	N	
EV	9	1	Computers, equipment, & accessories - Silv/Wht USB "Futures without violence"; LT middle drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Unknown Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/14/2022	Y	N	N	
EV	10	1	Computers, equipment, & accessories - Blk, [REDACTED] Ultra, 8GB in clear case, Prod Code [REDACTED] Top LT drawer home ofc desk (LOC 6) Article: SD CARD Make: [REDACTED] Model: Unknown Serial Number: Unknown Booked At: OTHER	9/14/2022	Y	Y	Y	
EV	11	1	Computers, equipment, & accessories - Red USB "denimdayusa.org"; LT middle drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Unknown Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/14/2022	Y	Y	Y	

A/V010500

EV	12	1	Computers, equipment, & accessories - Blu USB with silv color lanyard "AVB"; LT middle drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Unknown Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/14/2022	Y	Y	N	No Data in Date Range
EV	13	1	Computers, equipment, & accessories - L.Blu PNY USB, 8GB, w/blk lanyard; LT middle drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: PNY Model: Unknown Serial Number: Unknown Booked At: OTHER	9/14/2022	Y	Y	N	No Data in Date Range
EV	14	1	Computers, equipment, & accessories - Wht/Red triangle shaped USB "GUESS logo"; LT middle drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Unknown Model: Unknown Serial Number: Unknown Booked At: OTHER	9/14/2022	Y	N	N	No Data in Date Range
EV	15	1	Other - Silv [REDACTED] Digital Voice Recorder, [REDACTED] [REDACTED] LT middle drawer home ofc desk (LOC 6) Serial Number: Unknown Booked At: OTHER	9/14/2022	N	N	N	No Data in Date Range

AV010501

EV	16	1	Phones/Cell - [REDACTED] Cellphone; top middle dresser drawer in SW BR (LOC 6) Article: Cell Phone Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] DOJ File Control Number: [REDACTED] Booked At: OTHER	9/14/2022	Y	Y	Y	
EV	17	1	Phones/Cell - [REDACTED], IMEI [REDACTED]; top middle dresser drawer in SW BR (LOC 6) Article: Cell Phone Make: [REDACTED] Serial Number: Unknown Booked At: OTHER	9/14/2022	N	N	N	No Extraction
EV	18	1	Phones/Cell - Rose Gold color, LG cell phone; top middle dresser drawer in SW BR (LOC 6) Article: Cell Phone Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] DOJ File Control Number: [REDACTED] Booked At: OTHER	9/14/2022	Y	Y	Y	
EV	19	1	Computers, equipment, & accessories - Silv MacBook Pro Laptop with multiple stickers; RT bottom dresser drawer SW BR (LOC 6) Article: LAP TOP COMPUTER Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] DOJ File Control Number: [REDACTED] Booked At: OTHER	9/14/2022	Y	N	N	Encrypted
	20	0			N	N	N	Not Booked at CIC

AV010502

	21	0			N	N	N	Not Booked at CIC
	22	0			N	N	N	Not Booked at CIC
EV	23	1	Phones/Cell - [REDACTED] Article: Cell Phone Make: [REDACTED] Model: [REDACTED] Serial Number: Unknown Booked At: DETECTIVE BUREAU	9/15/2022	Y	Y	Y	
	24	0			N	N	N	Not Booked at CIC
	25	0			N	N	N	Not Booked at CIC
EV	26	1	Computers, equipment, & accessories - Envelope containing black External Hard Drive, [REDACTED], Black plastic, 1 TB located in "Patty Giggins" Office. Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	Y	N	N	Terminated per Warrant
EV	27	1	Computers, equipment, & accessories - [REDACTED], Desktop, Silver plastic, located in Patty Giggins Office. Article: COMPUTER DISPLAY SCREEN/MONIT Make: [REDACTED] Model: Desktop Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	Y	N	N	

AV010503

EV	28	1	Computers, equipment, & accessories - Thumbdrive, "██████████", Black plastic with Purple Tether Cord located in Operations Office Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: ██████████ Model: ██████████ Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	29	1	Computers, equipment, & accessories - Thumbdrive, "██████████", Black plastic with Purple Tether Cord located in Operations Office Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Centon Model: ██████████ Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	N	N	Cloned Only
EV	30	1	Computers, equipment, & accessories - Main Server, "Dell Power Edge T-710, gray located in Server Room Article: COMPUTER (CPU) Make: ██████████ Model: ██████████ Serial Number: ██████████ Booked At: OTHER	9/16/2022	Partial	Partial	N	Terminated per Warrant
EV	31	1	Computers, equipment, & accessories - ██████████ computer tower taken from Solis's office during MTA search warrant. Service Tag ██████████ Article: COMPUTER (CPU) Make: ██████████ Model: ██████████ Serial Number: Unknown Booked At: PATROL STATION	9/16/2022	Y	Y	Y	

AV010504

EV	32	1	Computers, equipment, & accessories - [REDACTED] Laptop from wiggins office during MTA search warrant Article: LAP TOP COMPUTER Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] Booked At: PATROL STATION	9/16/2022	Y	Y	Y	
EV	33	1	Computers, equipment, & accessories - blk/sil METRO thumbdrive from wiggins office from MTA search warrant Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Not Applicable Model: Unknown Serial Number: Not Applicable Booked At: PATROL STATION	9/16/2022	Y	Y	Y	
EV	34	1	Computers, equipment, & accessories - [REDACTED] computer tower from wiggins office from MTA search warrant, [REDACTED] Article: COMPUTER (CPU) Make: [REDACTED] Model: [REDACTED] Serial Number: Unknown Booked At: PATROL STATION	9/16/2022	Y	Y	Y	
EV	35	1	Computers, equipment, & accessories - Blk/Sil [REDACTED] laptop from solis's office during MTA search warrant. Article: LAP TOP COMPUTER Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	Y	Y	Y	

AV010505



EV	36	1	Computers, equipment, & accessories - Blk/Sil [REDACTED] computer tower from Soli's office during MTA search warrant. [REDACTED] Article: COMPUTER (CPU) Make: [REDACTED] Model: [REDACTED] Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	37	1	Computers, equipment, & accessories - Blk/Sil [REDACTED] computer tower from Avila's office during MTA search warrant. [REDACTED] Article: COMPUTER (CPU) Make: [REDACTED] Model: [REDACTED] Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	N	N	
EV	38	1	Computers, equipment, & accessories - Blk/Sil [REDACTED] Computer tower from Bercerra's office during MTA search warrant. [REDACTED] Article: COMPUTER (CPU) Make: [REDACTED] Model: [REDACTED] Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	N	N	
EV	39	1	Computers, equipment, & accessories - Sil/Org portable hard drive from Becerra's office during MTA search warrant and blk cable Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: Not Applicable Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	N	N	N	Not Assigned - Not in Search Warrant

AV010506

EV	40	1	Computers, equipment, & accessories - Sil/Ylw 2GB [REDACTED] thumbdrive from Becerra's office during MTA search warrant Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Not Applicable Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	41	1	Phones/Cell - Blk apple cellphone from Becerra's office during MTA search warrant. Sim card attached to back. Article: Cell Phone Make: [REDACTED] Model: [REDACTED] Serial Number: Unknown Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	42	1	Computers, equipment, & accessories - Blk/Sil [REDACTED] computer tower from Hernandez's office during MTA search warrant. [REDACTED] Article: COMPUTER (CPU) Make: [REDACTED] Model: [REDACTED] Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	N	N	
EV	43	1	Computers, equipment, & accessories - Blk [REDACTED] 500GB drive from Herandez's office, inside plastic wrap belonging to Jennifer Loew. Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	Y	Y	Y	

AV010507

EV	44	1	Computers, equipment, & accessories - Blk/Sil [REDACTED] computer tower from Hernandez's office during MTA search warrant. [REDACTED] Article: COMPUTER (CPU) Make: [REDACTED] Model: [REDACTED] Serial Number: Not Applicable Booked At: OTHER	9/16/2022	N	N	N	Not Booked at CIC
EV	45	1	Computers, equipment, & accessories - 2 red/blk 32GB [REDACTED] thumbdrives from Hernandez's office. Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	
A38	46	1	Computers, equipment, & accessories - red/blk 4GB Innovera thumbdrive from Hernandez's office Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	N	N	
EV	47	1	Computers, equipment, & accessories - blk 32GB [REDACTED] thumbdrive from Hernandez's office Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	

A/V010508

EV	48	1	Computers, equipment, & accessories - whi/grn [REDACTED] 64GB thumbdrive from Hernandez's office Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	49	1	Computers, equipment, & accessories - Sil/Blk/Whi METRO thunbdrive from Hernandez's office Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Not Applicable Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	N	No Data In Date Range
EV	50	1	Computers, equipment, & accessories - Blk/Sil [REDACTED] computer tower from Englund's office. S [REDACTED] Article: COMPUTER (CPU) Make: [REDACTED] Model: [REDACTED] Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	N	N	
EV	51	1	Computers, equipment, & accessories - red/sil 8GB thumbdrive from Englund's office during MTA search warrant. Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Not Applicable Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	

AV010509

EV	52	1	Electronics (audio, TV) - blk sanyo tape recorder from kuehl's house Article: Other Make: [REDACTED] Model: [REDACTED] Serial Number: Not Applicable Booked At: OTHER	9/16/2022	N	N	N	No Date in Date Range
EV	53	1	Computers, equipment, & accessories - Silver [REDACTED] computer Article: LAP TOP COMPUTER Make: [REDACTED] Model: Unknown Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	N	N	N	Encrypted
EV	54	1	Computers, equipment, & accessories - SILVER APPLE COMPUTER Article: LAP TOP COMPUTER Make: [REDACTED] Model: Unknown Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	N	N	N	Partial Image
EV	55	1	Phones/Cell - rose gold [REDACTED] cellphone with blu case taken from Kuehl's residence. Article: Cell Phone Make: [REDACTED] Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	

AV010510

EV	56	1	Computers, equipment, & accessories - SILVER [REDACTED] COMPUTER Article: LAP TOP COMPUTER Make: [REDACTED] Model: Unknown Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	57	1	Computers, equipment, & accessories - sil [REDACTED] cd drive and whi cable from kuehl's residence Article: OTHER Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	N	N	N	CD Player
EV	58	1	Phones/Cell - ROSE GOLD [REDACTED] Article: Cell Phone Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	N	N	N	Damaged Phone/No Extraction
EV	59	1	Computers, equipment, & accessories - sil [REDACTED] 80GB computer drive Article: OTHER Make: [REDACTED] Model: [REDACTED] Serial Number: Not Applicable Booked At: OTHER	9/16/2022	N	N	N	Damaged Phone/No Extraction
EV	60	1	Cameras: Equip & Access - sil nikon coolpix digital camera from kuehl's residence Article: CAMERA Make: nikon Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	N	N	

AV010511

EV	61	1	Cameras: Equip & Access - blk [REDACTED] sx110 digital camera from kuehls residence. Article: CAMERA Make: [REDACTED] Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	62	1	Computers, equipment, & accessories - red [REDACTED] 4 GB thumbdrive with zelda paperwork from kuehls residence Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: sandisk Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	N	N	
EV	63	1	Computers, equipment, & accessories - blu 16GB [REDACTED] thumbdrive from kuehls residence Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	64	1	Computers, equipment, & accessories - USB DRIVE [REDACTED] 1GB Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	Y	N	N	

A/V010512

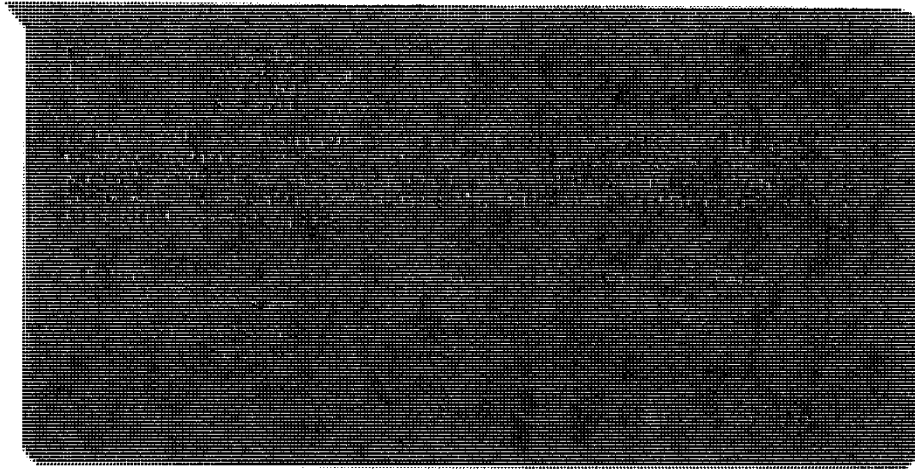
EV	65	1	Computers, equipment, & accessories - whi 256GB [REDACTED] thumbdrive from kuehls residence Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	66	1	Computers, equipment, & accessories - USB DRIVE 1GB Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: SCAN DISK Model: [REDACTED] Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	Y	N	N	
EV	67	1	CDs/Video - cd disc labeled LA political roast from kuehls residence Booked At: OTHER	9/16/2022	N	N	N	Not Assigned Not in Search Warrant

AV010513



## **EXHIBIT 2**

AV010514



AV010515

**PROOF OF SERVICE - 1013A(3), 2015.5 C.C.P.)**

STATE OF CALIFORNIA )  
 ) ss  
COUNTY OF LOS ANGELES )

I am employed in the County of Los Angeles, State of California a above th ag o f an no part t th withi  
action m busines addres i 88 Wes Sixt Street Suit 400 Lo Angeles Californi 90017

O Septembe 22 2022, I serv d t e foregoi g document, described as

**SUPPLEMENTAL DECLAR TION OF SG ., MAX FERNANDEZ UR UANT TO COUR 'S  
O DER DATED SEP EMBER 0, 022**

on all interest d partes li te below by tr ns itting to all interest d partes a true co y hereof as follows:

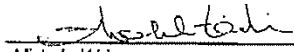
<b>Cheryl O'Connor, Esq.</b> JONES DAY 3161 Michelson Drive, Suite 800 Irvine, CA 92612 [REDACTED]	<b>Robert Dugdale, Esq.</b> KENDALL BRILL & KELLY LLP 10100 Santa Monica Blvd., Suite 1725 Los Angeles, CA 90067 [REDACTED]
<b>Harvinder S. Anand, Esq.</b> ANAND LAW GROUP 790 E. Colorado Blvd., # 900 Pasadena, CA 91101 [REDACTED]	<b>Dawyn Harrison, Esq.</b> Office of the County Counsel, 648 Hahn Hall of Admin. 500 W Temple St, Los Angeles, CA 90012 [REDACTED]

☒ **BY MAIL** by placing a true copy thereof enclosed in a sealed envelope addressed as set forth above. I am  
readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it  
would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles,  
California in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid  
if postal cancellation date or postage meter date is more than one (1) day after date of deposit for mailing in affidavit.

☒ **BY ELECTRONIC TRANSMISSION** by transmitting a PDF version of the document(s) by electronic mail to the  
party(s) identified on the service list using the e-mail address(es) indicated

☒ I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on September 22, 2022, in Los Angeles, California

  
Michele Kirk

AV010516

# **ATTACHMENT C**

AV010517



COUNTY OF LOS ANGELES  
OFFICE OF THE COUNTY COUNSEL

645 KENNETH HAHN HALL OF ADMINISTRATION  
500 WEST TEMPLE STREET  
LOS ANGELES, CALIFORNIA 90012-2713

DAWYN R. HARRISON  
Acting County Counsel

September 21, 2022

TELEPHONE

FACSIMILE

TDD

CONFIDENTIAL

THIS MATERIAL IS SUBJECT TO THE  
ATTORNEY-CLIENT AND/OR THE ATTORNEY  
WORK PRODUCT PRIVILEGES

VIA EMAIL AND U.S. MAIL

The Honorable Alex Villanueva  
Sheriff, Los Angeles County  
211 West Temple Street, 8<sup>th</sup> Floor  
Los Angeles, California 90012

Re: Response to Your September 20, 2022 Letter

Dear Sheriff Villanueva:

This in response to your letter dated September 20, 2022, stating you are refusing Bill Seki as counsel for the County of Los Angeles Sheriff's Department ("LASD") and engaging the appropriate counsel.

First, all the issues raised in your letter are moot. Yesterday, California Attorney General Rob Bonta notified Undersheriff Murakami that his office is assuming responsibility for: a) any investigation into whether individuals committed a crime by giving advance warning of the search warrants to Supervisor Kuehl and Patricia Giggans; and b) the underlying investigation of Peace Over Violence, Patricia Giggans, Supervisor Sheila Kuehl, Los Angeles Metropolitan Transportation Authority, etc., including the warrants issued in 2021 and 2022. As you acknowledged previously, the Attorney General has the authority to assume these responsibilities because he has complete supervisory authority over you and may direct your and LASD's investigative activities. In the Attorney General's letter he stated the LASD "should cease its investigative activity and refrain from any actions in furtherance of these investigations, including public statements or court filings related to the investigations." Based on that directive, you did not have authority to send your September 20, 2022, letter, nor does the LASD require legal services relating to the continued investigation by the Attorney General. To the extent that counsel is required for the LASD to explain prior conduct in connection with the 2021 and 2022 warrant proceedings, Mr. Seki will continue to represent the LASD.


HOA 103648555 5

AV010518

The Honorable Alex Villanueva  
September 21, 2022  
Page 2

Second, I wanted to remind you that only the Office of County Counsel, or the law firms we retain, may represent you, in your official capacity, and the LASD.<sup>1</sup> Further, even if all of the requirements of Government Code section 31000.6 – Employment of Legal Counsel to Assist Assessor or Sheriff; Conflicts of Interest - are met and conflict of interest counsel is deemed appropriate for you in your official capacity, the conflict counsel must be retained through my office.<sup>2</sup> Therefore, you have no authority to retain your own counsel to represent either you or the LASD, nor is the County of Los Angeles responsible for any of the costs incurred by those law firms. I recently discovered that you improperly retained Werksman Jackson & Quinn LLP in this matter. I will notify them that they have no authority to represent you or LASD and will not be paid by the County of Los Angeles, and I will copy the Attorney General's Office.

Very truly yours,

  
DAWYN R. HARRISON  
Acting County Counsel

DRH:gl

Enclosures

c: Timothy K. Murakami, Undersheriff

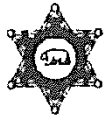
John L. Satterfield, Commander  
Chief of Staff

<sup>1</sup> Government Code section 25203 establishes that the board of supervisors shall "direct and control the conduct of litigation in which the county, or any public entity of which the board is the governing body, is a party." Los Angeles County Charter Article VI, section 21 vests County Counsel with "exclusive charge and control of all civil actions and proceedings in which the County or any officer thereof, is concerned or is a party" (footnotes omitted). By law, the Office of County Counsel is charged with providing legal advice, on behalf of the Board, to constituent entities and officials within the County. California Government Code section 23005 (County exercises authority "only through the board of supervisors" or its authorized agents); id. § 25203 (the Board shall "direct and control the conduct of litigation in which the county, or any public entity of which the board is the governing body, is a party"); Los Angeles, California, County Charter Article VI, section 21 (County Counsel is vested with "exclusive charge and control of all civil actions and proceedings in which the County or any officer thereof, is concerned or is a party" (footnotes omitted)).

<sup>2</sup> Government Code section 31000.6. Please see the attached orders from *County of Los Angeles v Sheriff Alex Villanueva, et al.* regarding assignment of counsel.

HQA 103848555 5

AV010519

**OFFICE OF THE SHERIFF**

COUNTY OF LOS ANGELES

**HALL OF JUSTICE**

ALEX VILLANUEVA, SHERIFF



September 20, 2022

Dawyn Harrison, Acting County Counsel  
County of Los Angeles – Office of the County Counsel  
500 West Temple Street, Suite 648  
Los Angeles, California 90012

Dear Ms. Harrison:

**DEMAND FOR DEFENSE COUNSEL**

It appears clear you have no intention of removing your office's control as counsel to the Department on this matter. Unless I misunderstood, you insist we continue to communicate and seek advice from your Senior Assistant County Counsel, Mr. Jason Gonzalez, and Mr. Bill Seki, as stated in your letter.

As you are aware, the morning of the search warrant service Supervisor Shelia Kuehl stated to reporters, *"I heard from County Counsel last night that she got a tip from Max Huntsman that the search would happen this morning."* In the event you have not heard the statement for yourself, it was aired by every local news channel, and it is posted on all LASD social media accounts.

Ms. Kuehl's allegation that you, or a representative from your office, and Mr. Huntsman provided her with advanced knowledge of a criminal search warrant in which she was a suspect makes it unethical and inappropriate for your office to have further access to information or decision making regarding this matter. Moreover, by retaining the services of Bill Seki, there is a clear further potential for you, or your office, to interfere in the filing of motions and overall employment status of Mr. Seki. I must also highlight, based on Supervisor Kuehl's statements and Attorney General Rob Bonta's announcement today, both you and your office are likely to become the focus of a criminal investigation by the Office of the Attorney General, and as such the conflict of interest is undeniable.

Since you intend to continue blocking any independent counsel, we are forced to seek appropriate counsel in order to prevent further interference and/or obstruction of our investigation by your office. Under the State Bar Rule 1.6, the potential for Mr. Seki to report information or communications to your office, and seek approval or denial for legal strategy, regarding our investigation disqualifies him as counsel. Based on this, we can no longer accept Mr. Seki as counsel and decline his further legal services.

AV010520

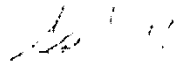
Ms. Harrison

-2-

September 20, 2022

If I misunderstood your position, please advise. Due to the exigency of this pending matter, the Department will engage the appropriate counsel and inform you once retained. Should you have any questions, please contact Undersheriff Timothy Murakami, at [REDACTED]. Thank you for your anticipated cooperation with this matter.

Sincerely,



ALEX VILLANUEVA  
SHERIFF

AV:JLS:js

c: Jason Gonzalez, Senior Assistant County Counsel

AV010521





COUNTY OF LOS ANGELES  
OFFICE OF THE COUNTY COUNSEL

648 KENNETH HAHN HALL OF ADMINISTRATION  
500 WEST TEMPLE STREET  
LOS ANGELES, CALIFORNIA 90012-2713

DAWYN R. HARRISON  
Acting County Counsel

September 20, 2022

**CONFIDENTIAL**

THIS MATERIAL IS SUBJECT TO THE  
ATTORNEY-CLIENT AND/OR THE ATTORNEY  
WORK PRODUCT PRIVILEGES

TELEPHONE

FACSIMILE

TDD

VIA EMAIL AND U.S. MAIL

The Honorable Alex Villanueva  
Sheriff, Los Angeles County  
211 West Temple Street, 8<sup>th</sup> Floor  
Los Angeles, California 90012

**Re: Response to Your September 19, 2022 Letter**

Dear Sheriff Villanueva:

I am in receipt of your letter from yesterday requesting counsel to handle the court proceedings related to the warrants issued on Wednesday, September 14, 2022 ("2022 Warrants"). After reviewing the letter, I believe Undersheriff Murakami has not had a chance to let you know that Bill H. Seki, a partner at Seki, Nishimura & Watase, was assigned to handle the 2022 Warrants matters last week. It was our understanding, based on your and Undersheriff Murakami's press statements, that you were recused from handling the 2022 Warrants. As a result, we communicated directly with Undersheriff Murakami about assigning the defense of the 2022 Warrants to Mr. Seki and his firm on September 16, 2022, the day he made a request for counsel. Your department did not seek my office's assistance when it prepared the 2022 Warrants nor did it request to use Mr. Seki's professional services to assist in the preparation of the 2022 Warrants. Therefore, we had to quickly gather the necessary facts and perform an ethical and legal review when the Undersheriff requested counsel on September 16, 2022.

By way of background, Mr. Seki has been representing your department on the warrants issued in February and March of 2021 to the Los Angeles County Metropolitan Transportation Authority (Metro), Office of the Inspector General of the Metro (OIG), and Peace Over Violence ("2021 Warrants") since March 2021. Mr. Seki has actively responded to multiple motions challenging the warrants,

HOA 103846887.3

AV010522

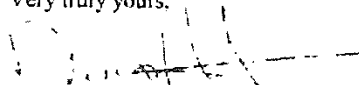
The Honorable Alex Villanueva  
September 20, 2022  
Page 2

communicated with your department about the warrants, and made several appearances defending the warrants for your department, including the last one in front of the Honorable Eleanor Hunter on September 1, 2022, addressing the scope of the 2021 Warrants and ordering the assignment of a Special Master.

When Mr. Seki was retained to provide his professional services for the 2021 and 2022 Warrants, confidentiality silos were created. Those confidentiality silos are in effect and will remain that way until the conclusion of these matters. As to the other claims you make in your letter, I deny them and will not further acknowledge them with a response.

If you have any questions about the 2021 or 2022 Warrants, please contact Mr. Seki at [REDACTED], or Senior Assistant County Counsel Jason Gonzalez at [REDACTED].

Very truly yours,

  
DAWYN R. HARRISON  
Acting County Counsel

DRH:gl

c: Timothy K. Murakami, Undersheriff

John L. Satterfield, Commander  
Chief of Staff

HOA.103846887.3

AV010523



Ms. Harrison

-2-

September 19, 2022

Moreover, Government Code § 995.2 (b), provides in part: If an employee or former employee requests in writing that the public entity, through its designated legal counsel, provide for a defense, the public entity shall, within 20 days, inform the employee or former employee whether it will or will not provide a defense, and the reason for the refusal to provide a defense.

Furthermore, as you are also aware, Government Code § 25303 provides in part: This section shall not be construed to affect the independent and constitutionally and statutorily designated investigative and prosecutorial functions of the sheriff and district attorney of a county. The board of supervisors shall not obstruct the investigative function of the sheriff of the county nor shall it obstruct the investigative and prosecutorial function of the district attorney of a county.

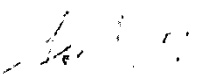
Finally, Los Angeles County Code of Ordinances § 6.44.190, provides in part: The OIG shall not disclose, without the Sheriff's authorization, any of the Sheriff's Department's confidential personnel, investigative, or disciplinary information unless such information is already a matter of public record.

Should you fail to provide defense counsel in this matter, I will ask the court to order you, on behalf of the Board of Supervisors, to comply with their obligation by a Petition for Writ of Mandate.

As you are also aware, if you deny my demand for counsel, I am entitled to recover from the public entity such reasonable attorney's fees, costs and expenses as are necessarily incurred in defending the action or proceeding if the action or proceeding arose out of an act or omission in the scope of his employment as an employee of the public entity. See, Sparks v. Kern County (2009) 173 Cal App. 4th 194.

Your response in writing is due by the end of the next business day from the date of this letter, Tuesday, September 20, 2022. Upon receipt, we will advise of the firm of my choosing. Should you have any questions, please contact my Chief of Staff, Commander John Satterfield, at [REDACTED]. Thank you for your anticipated cooperation with this matter.

Sincerely,



ALEX VILLANUEVA  
SHERIFF

AV010525

Fwd: Latest MTA/Kuehl/Giggans warrants

From: [REDACTED] <[REDACTED]@counsel.lacounty.gov>  
Sent: Wednesday, September 14, 2022 5:39 PM  
To: [REDACTED] <[REDACTED]@law.com>  
Cc: [REDACTED] <[REDACTED]@counsel.lacounty.gov>  
Subject: Latest MTA/Kuehl/Giggans warrants

Hi Bel  
I know you've had some conversations with Lana today about the newest round of warrants served by LASD this morning in the MTA/Kuehl/Giggans matter, and I just wanted to advise that County Counsel is not currently authorizing you to appear/work on those warrants on behalf of the Sheriff's Department. Please let me know if you have any questions. Thanks,

[REDACTED]  
[REDACTED]  
Assistant County Counsel  
[REDACTED] @lmc.com

AV010526



Los Angeles County Sheriff's Department

September 16 at 11:49 AM

#### LA County Counsel Terminates LASD's Lawyer Same Day Supervisor Kuehl's Warrant Is Challenged in Court

In an unprecedented move of retaliation after Wednesday's lawful service of a search warrant on the residence of Supervisor Sheila Kuehl and others, the Board of Supervisors' Office of County Counsel has terminated the services of LASD's legal representation. Simply put, the Board of Supervisors and County Counsel fired our lawyer the same day our search warrant was challenged in court and an emergency hearing was set for September 22, 2022.

This is exactly the type of obstruction, interference, and political shenanigans which Sheriff Alex Villanueva fights against daily. We are now forced into a position of being unrepresented with no County authorization to pay for legal representation and reduced to solicit pro bono representation in this matter.

If Supervisor Sheila Kuehl, Commissioner Patty Giggins, The Board of Supervisors, County Counsel and the Office of the Inspector General are as committed to transparency and accountability as they continuously state, then why are they scared for these electronic devices to be examined and fighting the search warrant?

Find Latest MTA's with Giggins warrants

From [REDACTED] at [REDACTED]  
Sent: [REDACTED]  
Subject: [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

AV010527

# **ATTACHMENT D**

AV010528

761551N25A SH AD 32A (2/72)

COUNTY OF LOS ANGELES  
**SHERIFF'S DEPARTMENT**

"A Tradition of Service"

OFFICE CORRESPONDENCE

DATE: December 17, 2004

FILE NO.

FROM: ALEX VILLANUEVA, SERGEANT CARSON STATION	TO: DIVISION CHIEFS AND COMMANDERS
---	------------------------------------

SUBJECT: AN OPEN LETTER

The purpose of this memorandum is to dispel any rumors and inform you of my intentions regarding my future with our Department. As you all well know, I have been exhausting all administrative remedies to address my denial of promotion stemming from the 2003 Lieutenant Examination, and now I have read the most recent Intent to Promote teletype for lieutenants. As expected, I was not included on this list for reasons you know in more detail than I do, as I can only speculate what transpires behind closed doors.

Up to this point in time my experience, education, leadership, and communication skills have always served me well. During my ten years experience with the United States military I was privileged to have been promoted six times to positions of higher rank and responsibility. Perhaps this experience has burnished in me an expectancy of merit based promotions, and this expectancy was unrealistically carried over to our Department.

From what I have come to understand regarding ethical administrative behavior, I find no legal or moral justification for the activities you have engaged in over the course of the last year and a half. From rewriting oral interview scoring standards in order to deliberately suppress exam scores, providing secret exam preparation classes for the privileged few, and gaming the appeals process in order to gerrymander the candidate pool, you have compromised your integrity and that of the Department's.

Perhaps you have succumbed to a moral inversion, wherein you believe your actions and those of your peers are in the best interest of the Department and supported by civil service rules. Your decision making is a result of group-think and the feeling of infallibility, making it difficult for you to see beyond your own career success. I want to encourage each and every one of you to take a moment and engage in critical reflexivity, the ability to see the organization through someone else's experience.

Page 1 of 2

AV010529



My organizational experience has told me that I do not count, no matter what my qualifications may be, how hard I work, or how many bright ideas I possess. I do not get "invited" to apply to jobs, nor are jobs created exclusively for me. There is no captain or higher pushing aside more qualified individuals in order to make room for me, or steering me in the "right" direction. There is no rater who overlooks my shortcomings and gives me undeserved outstanding evaluations or 100 AP's. My queries are addressed with attorneys and mind-numbing technical rationality.

Promoting dozens of individuals to the rank of lieutenant is a wonderful opportunity to assert organizational values such as meritocracy, equality, and diversity, while at the same time promoting efficiency and effectiveness, and boosting the moral of the Department. Instead you deliberately chose the values of cronyism, nepotism, and tokenism. These have been the same values you have been espousing with just about every promotional process within our ranks. This negatively impacts public safety by promoting corruption and incompetence.

I am curious to know just how much public resources you will squander as you attempt to defend the indefensible. Deliberately attempting to suppress or retard the upward mobility of Latinos on our Department is illegal, immoral, and politically incomprehensible. Each and every one of you contributes to this unfolding tragedy by your actions or inactions. I will say this: as a Latino, I do not seek special favors, accommodations, or any sort of "affirmative action" in order to receive a promotion. I expect to be promoted because there is a clearly identified universal standard based on bonafide occupational qualifications, not golf handicaps or quotas.

It has been painful watching you lie, obfuscate, conceal, mislead, or otherwise attempt to hide the truth. I want to encourage you to come to grips with the damage you inflict on our institution, and do what's right. In an interesting parallel to our Department, NASA swore after the Challenger tragedy that it should never happen again, then along came Columbia. After spending over \$30 million addressing Bouman, it is truly frightening to behold how little has been learned.

Leadership is defined by action, not position, and I plan to act decisively to assert my rights, not only as an employee, but as a citizen and proud resident of this County. Your legacy and the future of equality and equal opportunity in Los Angeles County are at a crossroads. I hope you make the right choices for the benefit of the County and the Department, and I must remind you that it is 2004, not 1964. Just as in Martin Luther King's day, I am confident of the supremacy of a simple idea - all men are created equal.

AV:av

# **ATTACHMENT “D”**

AV010531

From: Williams, Dara [REDACTED]  
Sent: Wednesday, October 12, 2022 5:54 PM  
To: Corbett, Brendan J. [REDACTED]; Chase, Bruce D. [REDACTED] Francisco, Holly A. [REDACTED]; OIG/COC Requests [REDACTED]  
Subject: Report Card On Sheriff's Department's Reforms 2019 to 2022 - Validation Draft

This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments

Dear Assistant Sheriffs Corbett, Chase, and Francisco,  
Attached is a validation draft of an Office of Inspector General Report Card on Sheriff's Department Reforms – 2019 to 2022. Please review the draft and provide any input or requested changes by the close of business on **October 20, 2022**. As a professional courtesy we have included the Audit and Accountability Bureau in this email.

As always, we find it beneficial if you bring any requested changes or input to our attention prior to October 20<sup>th</sup> in an effort to engage in a dialogue during the time the report is under review by the Sheriff's Department. If we are not aware of any requests or responses by the Sheriff's Department prior to that date, it is unlikely that we will make any adjustments prior to our anticipated report issuance date.

Please do not hesitate to reach out to me if you would like to discuss any portion of the report. The best way to reach me is on my cell phone, which is listed below.  
Best regards,  
Dara

**Dara Williams (she/her) | Chief Deputy, Inspector General**

Los Angeles County Office of Inspector General  
312 S. Hill Street, 3<sup>rd</sup> Floor, Los Angeles, CA 90013

(T) [REDACTED]  
(C) [REDACTED]  
(F) [REDACTED]

*Failure of county employees to timely comply with requests for information from the Office of Inspector General is a violation of Government Code section 25303, Los Angeles County Code section 6.44.190 and, under specified circumstances, Penal Code section 13670. Failure to cooperate with an investigation into potential police misconduct may result in revocation of peace officer certification. (Penal Code section 13510.8(b)(6).)*

*CONFIDENTIALITY NOTICE: This communication with its contents contains confidential and legally privileged information. It is solely for the use of the intended recipient. Unauthorized interception, review, use, or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the intended recipient, please contact the sender and destroy all copies of the communication.*

AV010532



# OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ALEX VILLANUEVA, SHERIFF



October 28, 2021

The Honorable Board of Supervisors  
County of Los Angeles  
383 Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

Dear Supervisors:

## IMMINENT THREAT TO PUBLIC SAFETY

As the elected Sheriff of Los Angeles County serving over ten million residents and managing an organization of 18,000 employees, I am notifying you of the imminent threat to public safety which will be created by your vaccination mandate and ratified by the Los Angeles County Board of Supervisors (Board) on August 10, 2021. If I were to follow your mandate, I could potentially lose 44 percent of my workforce in one day. I cannot enforce reckless mandates that put the public's safety at risk.

The Los Angeles County Sheriff's Department (Department) has already been "defunded" by over one thousand positions. The Los Angeles County Board of Supervisors is the only board in the entire nation that has continued with last year's defund law enforcement movement. Every other board in the nation has restored funding to their law enforcement agencies. As of this week, homicide rates are up to 44 percent and aggravated assaults are up nearly 23 percent. Despite the substantial loss of personnel, increase in workload, and rise in crime, I have been provided no additional resources by the Board, and you continue to defund my department and freeze my service budget.

For the entire course of this pandemic and prior to any vaccination being available, my employees worked tirelessly to fulfill their commitment to public safety by continuing to answer calls for service, maintaining safe jails, and even assisting to vaccinate our most vulnerable at-risk community members. It is heartbreaking to think that these employees who worked through the pandemic and were called "heroes" are now being threatened with termination because they make a personal medical choice.

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1850 —

AV010533

The Honorable Board of Supervisors

-2-

October 28, 2021

Compounding this issue is the fact my Department is experiencing a mass exodus of employees who are retiring early. I currently have 1,605 employees that have 28 years of service or more. This means they could retire without financial consequence. This mandate would certainly expedite many of these employees decision to retire.

This Board's mandate will cause patrol services to significantly decline. I would be forced to take drastic measures such as reducing services to the County and contract residents, which would cause the closure and realignment of patrol stations. Specialized units including our Aero and Special Enforcement Bureaus, and Headquarters Detectives would be nearly eliminated.

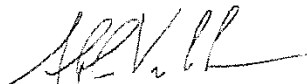
Of great concern is the upcoming fire season. With the reduction of personnel, I would be unable to mobilize and deploy mobile field forces, which are critical in conducting evacuations during disasters. I have conveyed to other local law enforcement partners I could potentially not have resources to deploy in their time of need due to critical staffing shortages created by this Board's mandate.

There are other alternatives that the Department has incorporated to combat the COVID-19 virus. I have ordered my staff to wear masks. Those that have not been vaccinated must submit to COVID-19 testing. With the pandemic waning, there is no justification for your mandate. This mandate is like putting up storm windows after the storm has passed.

Unlike other County departments that can close their doors and merely cause an inconvenience to the general public, the Department operates 24/7 to protect the public. I cannot afford to cut emergency services or choose not to send a patrol car to assist a community member in need. As the Sheriff, I can firmly tell you this mandate will create a pandemic of chaos within our county resulting in tragic losses.

Should you have any questions or would like to discuss further, please feel free to contact me at [REDACTED].

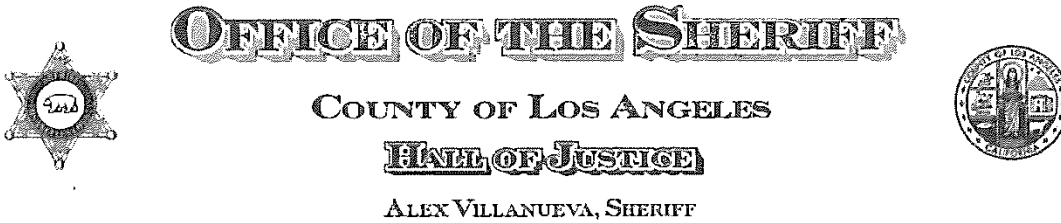
Sincerely,



ALEX VILLANUEVA  
SHERIFF

AV010534

# EXHIBIT 58



October 19, 2022

The Honorable Board of Supervisors  
County of Los Angeles  
383 Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

Dear Supervisors:

**RETALIATION BY THE OFFICE OF THE INSPECTOR GENERAL**

On February 18, 2021, I sent you a letter titled, "*The Need for an Honest and Objective Inspector General*" [Attachment A]. In the letter I documented numerous examples of Mr. Max Huntsman's lack of integrity, objectivity, confidentiality, ethics, professionalism, accountability, and an overall lack of intellectual honesty.

On September 21, 2022, I sent you a letter titled, "*Request for Removal of Max Huntsman as Inspector General Resulting from Allegations of Conspiracy to Commit Obstruction in Search Warrant*" [Attachment B]. I wrote to you listing the reasons why Mr. Huntsman needed to be relieved of his duties.

On October 3, 2022, I sent you a letter titled, "*Demand to Relieve Specified Confidential Employees from their Duties of Public Trust*" [Attachment C]. This was connected to the alleged conspiracy to commit obstruction of justice involving the unlawful sharing of confidential search warrant information with Supervisor Sheila Kuehl by members of her staff, the Office of County Counsel (County Counsel), and Mr. Huntsman.

You have chosen not to provide a response to any of the correspondences mentioned above, and you have failed to take any corrective action regarding these matters.

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1850 —

AV010458

The Honorable Board of Supervisors

-2-

October 19, 2022

On October 12, 2022, my Assistant Sheriffs received an e-mail from Dara Williams of the Office of the Inspector General (OIG) [Attachment D], advising them of a report being issued by their office on October 21, 2022, titled "*Report Card on Sheriff's Department's Reforms 2019 to 2022.*"

Concocting a new way to recycle old information, thus generating media attention and a false narrative during the election cycle, is blatant retaliation by the OIG in response to my public calls for his removal, pure and simple. This manner of regurgitating past reports and calling it a "report card" has never been done for previous sheriffs, and the timing is obviously designed to affect the outcome of the election. A true "report card" would occur AFTER my first term, not in the final weeks leading up to the election.

Additionally, the manner in which this report was designed is intentionally unethical and harmful. Providing all of the recommendations written over the last four years, while deliberately deleting the volumes of responses the Department has provided to the OIG is specifically engineered to hurt both the Department and me.

The vast majority of OIG's recommendations over the years are unattainable due to either lack of funding or lack of personnel. Never once has anyone from the OIG advocated to add funding, lift the hiring freeze, or increase staffing of the Department in order to achieve some of these recommendations.

As a reminder of the hypocrisy, County Counsel showed deference to the previous sheriff in similar matters, as evidenced by the video depicting Elizabeth Miller of County Counsel, where she explained that County Counsel did not investigate during the months leading up to the election, so they would not potentially influence the outcome.

For the truth about any of these issues, please go to <https://lasd.org/transarency/>.

Should you have any questions or would like to discuss further, please feel free to contact my Chief of Staff, Commander John Satterfield at [REDACTED].

Sincerely,

  
ALEX VILLANUEVA  
SHERIFF

AV010459



The Honorable Board of Supervisors

-3-

October 19, 2022

AV:JLS:ac

Attachments:

- A - Letter: The Need for an Honest and Objective Inspector General
- B - Letter: Request for Removal of Max Huntsman as Inspector General Resulting from Allegations of Conspiracy to Commit Obstruction in Search Warrant
- C - Letter: Demand to Relieve Specified Confidential Employees from their Duties of Public Trust
- D - Email: Dara Williams, OIG

AV010460

# **ATTACHMENT “A”**

AV010461



# OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ALEX VILLANUEVA, SHERIFF



204  
808

February 18, 2021

The Honorable Board of Supervisors  
County of Los Angeles  
383 Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

Dear Supervisors:

## THE NEED FOR AN HONEST AND OBJECTIVE INSPECTOR GENERAL

The purpose of this communication is to advise you of my grave concerns with the conduct of your appointed Inspector General (IG), Max-Gustaf Huntsman, and the publications authored by his office which directly influence the unsuspecting public's perceptions regarding both the credibility of the Los Angeles County Sheriff's Department (Department) and the legitimacy of our operations. His zealot-like behavior continues to create civil liability for the County and potentially endangers the life of deputies in the field, as he artificially stokes animosity between the Department and the community.

In addition to potentially endangering the lives of our deputies, his intellectual dishonesty places the public at an increased risk. After utilizing good communication and de-escalation strategies, deputies can only ultimately perform the detention or arrest of an individual one of two ways: 1) The person voluntarily submits to lawful authority; or, 2) The person resists and the deputy uses force to overcome their resistance and gain safe control. As the public continues to be misled by Mr. Huntsman as to the Department being engaged in widespread "unlawful conduct," they are far less likely to voluntarily comply. Statistically, this in and of itself places members of the public in situations that are far less likely to have a peaceful resolution.

The expectation of the public regarding the conduct of an IG is they are dedicated to serving the public's interest by working tirelessly to fairly assess the operations of any given organization and provide meaningful input for reforms, which may be required to adapt to an ever-changing world. Indeed, the National Association of Inspectors General posits this public expectation is best served when:

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1850 —

SCANNED & E-MAILED TO BOS LIAISON  
TEAM 2/18/21

AV010462

The Honorable Board of Supervisors

-2-

February 18, 2021

This public expectation is best served by inspectors general when they follow the basic principles of integrity, objectivity, independence, confidentiality, professionalism, competence, courage, trust, honesty, fairness, forthrightness, public accountability, and respect for others and themselves (AIG Principles and Standards, pg. 3, 2014).

Please note the first two principles outlined above, integrity and objectivity. I will provide you a brief rundown of the fundamental defects of Mr. Huntsman's work product, starting with the most recent publications and working our way back towards the start of my administration.

The Office of Inspector General (OIG) report "Review and Analysis of Misconduct Investigations and Disciplinary Process" released in February 2021 suffers from multiple fatal defects, chief among them the fallacy of a study period (2015-2019) which encompasses two administrations without distinguishing and contrasting the data from both. Another fatal flaw is the use of individual cases in an anecdotal fashion as representative of the entire Department's operation without providing proper context with the totality of cases investigated and discipline rendered. A select quote from the introduction:

Notwithstanding the current Sheriff's assertions, we were not provided by the Sheriff, and in our review, we did not observe or find, any evidence of falsification of evidence or reports which resulted in the wrongful discipline of a department employee (pg. 4, 2021).

This statement is demonstrably false and illustrative of the nature of the report itself. The Department conducted an in-depth analysis of the Mandoyan case, which is now a public document, wherein it was proven that a key exculpatory witness was identified, interviewed, and the results concealed from both the Civil Service Commission and the employee fighting the discharge (see the Department's Case Analysis, October 1, 2019).

The next production from the OIG, "Report Back on Unlawful Conduct of the Los Angeles County Sheriff's Department" was a letter dated December 14, 2020, addressed to the Civilian Oversight Commission (COC), purportedly in response to a request from Commissioner Priscilla Ocen. The starkly sophomoric report amounted to nothing more than a rehash of current and past litigation and a torturous defense of the legal fallout from Mr. Huntsman's oversteps in a homicide investigation.

This report was designed exclusively as a political tool to discredit the Department and does not appear to have any legitimate purpose in oversight, transparency, or accountability. Perhaps the most startling false statement is the section subtitled

AV010463

The Honorable Board of Supervisors

-3-

February 18, 2021

"Failure to Investigate and Prohibit Deputy Secret Societies (pg 12) Mr. Huntsman has the Department's criminal and administrative investigations of the Kennedy Hall incident from former Sheriff Jim McDonnell's tenure and he is aware that 26 employees were disciplined, including four who were terminated as a result of that administrative investigation. Mr. Huntsman is also aware of the Department's new policy regarding forming or participating in deputy subgroups which was issued in February 2020 and is being vigorously enforced.

The preceding report, "The Right to Know Act: Los Angeles County Sheriff's Department Response to Police Transparency Reform" was published in November 2020 and in typical OIG fashion, deliberately used outdated information from January 2020 to make the false claim the Department was not complying with SB 1421. For the record, as of December 31, 2020, the Department achieved full compliance with SB 1421 with a 96.45 percent rate, a number Mr. Huntsman was well aware was in the making and far different than the 70 percent non-compliance rate he reported just a month earlier.

Mr. Huntsman is also aware of the issues the Department has had since the inception of SB 1421 with antiquated databases that do not communicate with each other and the severe lack of staffing to meet the new requirements (a failure of leadership by the previous administration). To wit, in a letter dated July 6, 2020, to former Board of Supervisors (BOS) Chair Supervisor Kathryn Barger, the Department outlined six different occasions where we requested additional resources through the Chief Executive Office and were denied repeatedly. It was only through cannibalizing different functions of the Department that we were able to muster enough personnel to satisfy SB 1421 and California Privacy Rights Act requests. Comparing our operation to Los Angeles Police Department's is a dishonest comparison based on disparate funding levels, IT infrastructure, and staffing levels.

Looking through the sheer number of reports authored by the OIG, a persistent pattern emerges wherein the OIG ignores Department investigations, results of investigations, and actions taken in response to complaints from the public. The November 17, 2020 report back to the COC regarding the alleged harassment of family members after fatal deputy-involved shootings is one example of this. The report negates in its entirety the concerns of the public over impromptu memorials and gang members loitering in the vicinities of their homes, concerns which were addressed properly by the Department's report.

Examining the OIG's report's table of contents alone since its inception reveals a deferential OIG during former Sheriff McDonnell's administration, with report titles of a generic and non-inflammatory nature, unlike those published during my administration.

AV010464

The Honorable Board of Supervisors

-4

February 18, 2021

As a matter of fact, the OIG generated as many reports during my first two years in office as they did during all of former Sheriff McDonnell's tenure, and that includes the conspicuously "confidential" report Mr. Huntsman prepared to bury the potentially illegal actions of former Sheriff McDonnell's Assistant Sheriff Mike Rothans for his purchase of a stolen vehicle from a contracted tow company.

Without question, these "reports" would be rejected by any legitimate academic institution. They are filled with unproven allegations, anecdotal data, omissions, distortions, and an overall permeation of bias and intellectual dishonesty. They are truly not the level of accuracy and authenticity expected in County government. Furthermore, if my own deputies consistently authored documents at this level, they would at the very least be placed on a performance improvement plan, and in cases of deception, omission, and lack of honesty, an administrative investigation would be conducted. I believe the responsibility for performance and accountability issues with Mr. Huntsman belongs in part to the COC. Yet, they seem too hyper-focused on political activism and calls for my own resignation to focus on this duty.

Since taking office in December 2018, I have continued my reforms within the Department to enhance public safety and strengthen the ties within our communities. As the elected Sheriff serving the most populous county in the nation and employing nearly 18,000 employees, this is no easy task. Having inherited significant problems from past administrations, I remain committed to effecting positive change for the residents of Los Angeles County.

As the first progressive democratic sheriff, I have delivered on many of my campaign promises to bring reform and transparency to the Department. I have instituted major reforms regarding Immigration and Customs Enforcement (ICE), leadership diversity, wage theft, and the single most important commitment to transparency – body worn cameras. Although Mr. Huntsman authored multiple reports on the Department's cooperation with ICE, he became silent in light of the moratorium on all inmate transfers to ICE custody. Again, this amounts to false documentation by omission and does not serve to inform either the public or the Department.

As a result of these unethical reports, the Department is suffering irreparable damage, and our standing in the community is being undermined by continual misleading and false attacks. It should be of great concern to all of us that his actions are eroding public trust and creating a liability for the Department. His hopelessly biased reporting will only invite future frivolous lawsuits which the hardworking taxpayers will have to waste money defending, while at the same time artificially rising tensions in the community which can endanger the lives of our deputies. This was clearly evidenced by the brutal attack on our two Compton Transit Services Bureau deputies which horrified the entire nation.

AV010465

The Honorable Board of Supervisors

-5-

February 18, 2021

The IG serves an advisory role, just like the COC. When their efforts are driven by political agendas and not facts, they fail to serve the public's expectations of oversight and betray the reason for their existence. As a result, their work product does not inform the Department's operations and will not be considered of any value. The Department will continue, however, to provide both entities all the information they are legally entitled to receive.

As you have been advised in writing, the Department continues to investigate a data breach discovered at the beginning of 2019. The Legislature has enacted a statutory scheme defining the powers and duties of a sheriff (Government Code Sections 26600-26778). Section 26600 generally provides:

The sheriff shall preserve peace, and to accomplish this object may sponsor, supervise, or participate in any project of crime prevention, rehabilitation of persons previously convicted of a crime, or the suppression of delinquency.

A sheriff is also expressly authorized and directed to investigate public offenses that have been committed and to arrest and take before a magistrate all persons who have committed a public offense (Sections 26601-26602). There is no statutory scheme that places anyone, including members of the OIG, above the law. As such, it is with concern that I read a letter from Lawrence Middleton to County Counsel, who had retained him to purportedly provide legal guidance on this very issue. In his words:

Upon completing my analysis, I wanted to bring to Undersheriff Murakami's attention a number of issues and concerns that cause me to counsel against a continuation or escalation of the investigation. Most notably, as detailed below, because none of the potential charges being investigated are likely to lead to a successful criminal prosecution, Department personnel involved in the investigation could place themselves in jeopardy of criminal prosecution and/or civil liability if they continue (March 6, 2020).

This letter appears to be an attempt to intimidate, coerce, or otherwise dissuade the Department from carrying out our lawful duty and is unacceptable. It should be noted neither County Counsel nor Mr. Middleton has knowledge of the scope or details of the investigation, rendering such opinions ill-informed and ill-advised. I have recused myself from this inquiry and know of its details superficially.

The Department needs an IG who is not ethically compromised and is certified by the National Association of Inspectors General. I expect the work product of the OIG to adhere to professional standards as cited in the Association of Inspectors General's book, "Principles and Standards for Offices of Inspector General," also known as the Green Book. The public, the Department, and BOS all deserve accurate reporting

AV010466

The Honorable Board of Supervisors

6

February 18, 2021

which is not politically motivated. I ask the BOS to consider my concerns and replace the IG with one who is accredited, unbiased, and capable of maintaining a professional working relationship. The Department's reputation is being unfairly tarnished by the IG in his personal attacks towards us. We need an IG who is fair and objective, not inflammatory and controversial.

The Department is a national trendsetter on many important issues, such as the relationship between local law enforcement and federal immigration enforcement, combatting the spread of COVID-19 in congregate living facilities and super-spreader events, the Wage Theft Task Force, defending the community during periods of civil unrest, and transparency. Our efforts are often adopted as best practices by other law enforcement agencies throughout the nation. Our reputation is at stake. The IG's personal vendetta should not come at the expense of our dedicated employees who put their lives on the line each and every day in service to the community.

Should you have any questions or would like to discuss further, please feel free to contact me at [REDACTED]

Sincerely,

ALEX VILLANUEVA  
SHERIFF

AV010467



The Honorable Board of Supervisors

-7-

February 18, 2021

AV:JAV:ac  
(Office of the Sheriff)

c: Rodrigo A. Castro-Silva, County Counsel, Office of the County Counsel

AV010468

# **ATTACHMENT “B”**

AV010469

**OFFICE OF THE SHERIFF****COUNTY OF LOS ANGELES****HALL OF JUSTICE****ALEX VILLANUEVA, SHERIFF**

September 21, 2022

The Honorable Board of Supervisors  
County of Los Angeles  
383 Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

Dear Supervisors

**REQUEST FOR REMOVAL OF MAX HUNTSMAN AS INSPECTOR GENERAL  
RESULTING FROM ALLEGATIONS OF CONSPIRACY TO COMMIT  
OBSTRUCTION IN SEARCH WARRANT**

On February 18, 2021, in a six-page letter, I informed you of my *"grave concerns with the conduct of your appointed Inspector General, Max Huntsman"*. I pointed out his *"zealot-like behavior which continues to create civil liability for the Los Angeles County"*. I stated his, *"intellectual dishonesty places the public at an increased risk"*. The letter ended with, *"I ask the Board to consider my concerns and replace the IG with one who is accredited, unbiased, and capable of maintaining a professional working relationship"*.

As you were also aware at the time, Mr. Huntsman was a felony suspect in a theft of electronic information investigation, which remains an active investigation at the Office of the Attorney General. You had an opportunity to relieve Mr. Huntsman of his duties then, but declined and the Board ignored my request. Unfortunately, your failure to address the issues I pointed out to you in 2021, has now resulted in an even more serious crime allegedly occurring, which is additionally under active investigation by the Office of the Attorney General.

On September 14, 2022, as you are likely aware, public corruption search warrants were served at multiple locations. During the service at Supervisor Shelia Kuehl's residence, she stated to reporters, *"I heard from County Counsel last night that she got a tip from Max Huntsman that the search would happen this morning"*. In the event you have not heard the statement for yourself, it was aired by every local news channel, and it is posted on all Los Angeles County Sheriff's Department's social media accounts.

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1850 —

AV010470

The Honorable Board of Supervisors

-2-

September 21, 2022

Moreover, based on Supervisor Kuehl's statements and Attorney General Rob Bonta's announcement, Mr. Huntsman and the Los Angeles County Counsel have now become the focus of a criminal investigation by the Office of the Attorney General, and as such, the conflict of interest in Mr. Huntsman remaining in his current assignment is untenable. For these reasons, I demand that Mr. Huntsman be treated like any other of the over 100,000 Los Angeles County employees and be relieved of his duties, pending the outcome of the Attorney General's criminal investigation.

Given the above, it is the established pattern and practice everywhere in the Los Angeles County, by every department, that an employee is to be relieved of duty and/or reassigned upon reliable knowledge of alleged criminal activity, and an investigation is pending which could lead to termination.

Should you have any questions or would like to discuss further, please feel free to contact my Chief of Staff, John L. Satterfield, at [REDACTED]

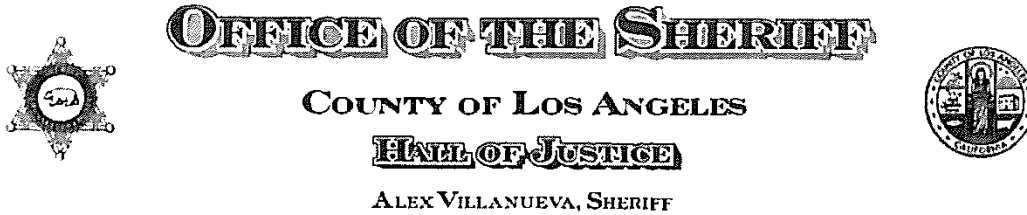
Sincerely,

ALEX VILLANUEVA  
SHERIFF

AV010471

# ATTACHMENT “C”

AV010472



October 5, 2022

The Honorable Board of Supervisors  
County of Los Angeles  
383 Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

Dear Supervisors:

**DEMAND TO RELIEVE SPECIFIED CONFIDENTIAL EMPLOYEES  
FROM THEIR DUTIES OF PUBLIC TRUST**

Shortly after I was sworn into office on December 3, 2018, my staff alerted me to a series of illegal personnel file downloads that were launched by members of the Office of Inspector General and Constitutional Policing Advisors from the administration of Sheriff Jim McDonnell. This data breach appeared to have been initiated immediately following the primary election that was held in June 2018 and does not appear to have been done for a lawful reason. Former Sheriff McDonnell's staff had launched an inquiry into the matter, only to abandon it without proper resolution.

In early 2019, we initiated a criminal inquiry into the matter and consulted with representatives from the state Attorney General's office and the Federal Bureau of Investigation (FBI). Inspector General Max Huntsman's protestations were centered on his claims that he had permission from the incumbent to view my confidential personnel files. Our investigation indicates no such permission existed, either in writing or supported by the former sheriff, who refused to answer questions from our investigators. The investigation was turned over to the Attorney General's office in September 2021 for a prosecutorial decision. Please note this investigation names five suspects of criminal conspiracy to commit burglary and illegal removal of personnel files, among other charges.

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1850 —

AV010473

The Honorable Board of Supervisors

-2-

October 5, 2022

We have previously written to your office regarding the liability of permitting named felony suspects to continue working in their official capacity during the pendency of the criminal investigation. Now we have a whole new set of issues based on the extraordinary admissions from Supervisor Sheila Kuehl during the execution of search warrants by deputies assigned to our Public Corruption Unit. On live local television, Supervisor Kuehl claimed to have been alerted to the search warrants in advance by Acting County Counsel Dawyn Harrison, with information she received from Inspector General Max Huntsman. On September 21, 2022, I wrote to you listing the reasons why Mr. Huntsman needed to be relieved of his duties [Attachment A], and I have yet to receive a response.

In addition to Supervisor Kuehl's own public statements, court documents [Attachment B] reveal the names of two other individuals who alerted Supervisor Kuehl of the service of the warrant, in an apparent conspiracy to obstruct justice: Lisa Mandel, Chief of Staff, District 3, and Torie Osborn, Senior Strategist, District 3. As appointed officials who are considered confidential employees and trusted to maintain confidentiality over internal records and law enforcement operations, the alleged conduct of the four individuals referenced herein, and others who during the course of the Attorney General's investigation may also be identified, can no longer have access to Los Angeles County Sheriff's Department (Department) records, operations, or be involved in decision-making regarding oversight and/or legal representation.

Consistent with standard Department policy, Mr. Huntsman will be removed from all access to Department facilities, personnel, and databases effective immediately. This standard is applied to all Department personnel who are named as a suspect in a criminal case involving felony crimes. The list of potential charges Supervisor Kuehl and Commissioner Patricia Giggans include the following:

- California Government Code 1090, Conflict of Interest
- California Penal Code 165, Bribery of a public official or member of a board of supervisors
- California Penal Code 182.5, Conspiracy to obstruct justice
- California Penal Code 182, Conspiracy to commit any crime
- California Penal Code 503, Embezzlement
- California Penal Code 424, Theft, or misappropriation of public funds

The list of potential charges facing Mr. Huntsman, Ms. Harrison, Ms. Mandel, and Ms. Osborn include the following:

AV010474

The Honorable Board of Supervisors

-3-

October 5, 2022

- California Penal Code 182, Conspiracy to commit any crime
- California Penal Code 182.5, Conspiracy to obstruct justice
- California Penal Code 31, Aiding and abetting a crime
- California Penal Code 135, Destruction of evidence

There is no alternate universe where county counsel can dictate the manner in which the Department is represented in court, while they are actively involved in allegedly concealing criminal activity and obstructing the investigative function of the sheriff [California Government Code 25303]. To the contrary of taking corrective action, both Supervisor Kuehl and Supervisor Hilda Solis have made public statements on social media condemning both myself and the Department for the execution of a lawful public corruption search warrant that was properly vetted, approved by a judge, and reaffirmed by a second judge. Acting County Counsel Harrison is in no position to deny compensating the attorney of our choosing, who won for us in court, based on these extraordinary set of events [Attachment C]. Her apparent motive in denying counsel was to see the search warrant overturned by the court for lack of proper counsel. It is your moral and legal obligation to pick up the costs for *Werksman Jackson & Quinn LLP*. Please refer to Ms. Harrison's own words:

*"... I wanted to remind you that only the Office of County Counsel, or the law firms we retain, may represent you, in your official capacity, and the LASD... Therefore, you have no authority to retain your own counsel to represent either you or the LASD, nor is the County of Los Angeles responsible for any of the costs incurred by those law firms. I recently discovered that you improperly retained Werksman Jackson & Quinn LLP in this matter. I will notify them that they have no authority to represent you or LASD and will not be paid by the County of Los Angeles, and I will copy the Attorney General's Office."*

It is not the first time we have informed you of unethical and/or incompetent representation by county counsel and contract counsel that have had negative consequences to the Department. From failing to adequately present a defense in a high-profile civil lawsuit, failing to aggressively challenge false assertions in employee lawsuits, to colluding with the Civilian Oversight Commission and the Inspector General's office to give the false impression we are not complying with the submission of subpoenaed information or testimony. It is clear you have weaponized legal representation of the Department as another avenue to discredit my administration for your political interests. This comes at great expense to the taxpayer and to our credibility, which seems to be your goal.

AV010475



The Honorable Board of Supervisors

-4-

October 5, 2022

To be clear, the investigation is real, my authority is real, and so is that of the Attorney General who has now assumed responsibility for the investigation, which was initiated at our request. The investigation itself regarding *Peace Over Violence* was initiated based on a criminal complaint from a whistleblower, and contrary to false assertions by those involved, we do not investigate people, only allegations of criminal activity. This is true of every investigation initiated by the Department, including those by the Public Corruption Unit.

In closing, as a matter of reference, I wrote a whistleblower memorandum back in December of 2004 regarding the unfolding corrupt actions of then Division Chief Paul Tanaka [Attachment D]. As a young sergeant, I laid out publicly in detail my concerns regarding the unethical conduct and behavior of the administration of then Sheriff Lee Baca. I was laughed at, ridiculed, attacked, and had my career derailed for over a decade. The Board of Supervisors were informed of Baca and Tanaka's corruption, as were members of the Office of Independent Review, but it wasn't until the Citizen's Commission on Jail Violence and the FBI intervened, when the corruption began to halt. Needless to say, I stood my ground and was ultimately vindicated.

Today and again, I am standing my ground. You have two choices: circle the wagons and protect corruption or come clean and stand up for doing the right thing. Choose wisely, history will be your judge.

Should you have any questions or would like to discuss further, please feel free to contact my Chief of Staff, Commander John Satterfield at [REDACTED]

Sincerely,



ALEX VILLANUEVA  
SHERIFF

AV010476

The Honorable Board of Supervisors

-5-

October 5, 2022

AV:JLS:js

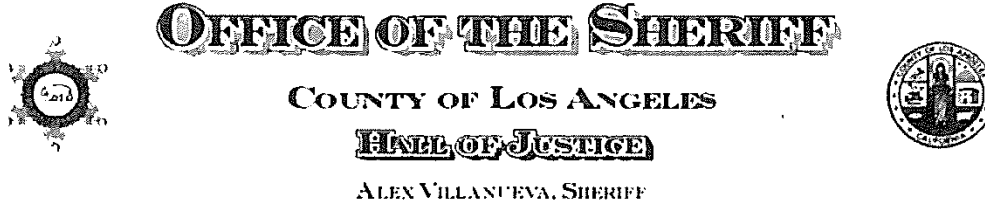
Attachments:

- A – Letter for Removal of Max Huntsman
- B – Court Documents (Declaration)
- C – County Counsel Correspondence
- D – Letter to LASD Executives (2004)

AV010477

# **ATTACHMENT A**

AV010478



September 21, 2022

The Honorable Board of Supervisors  
County of Los Angeles  
383 Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

Dear Supervisors

**REQUEST FOR REMOVAL OF MAX HUNTSMAN AS INSPECTOR GENERAL  
RESULTING FROM ALLEGATIONS OF CONSPIRACY TO COMMIT  
OBSTRUCTION IN SEARCH WARRANT**

On February 18, 2021, in a six-page letter, I informed you of my "grave concerns with the conduct of your appointed Inspector General, Max Huntsman." I pointed out his "zealot-like behavior which continues to create civil liability for the Los Angeles County." I stated his, "intellectual dishonesty places the public at an increased risk." The letter ended with, "I ask the Board to consider my concerns and replace the IG with one who is accredited, unbiased, and capable of maintaining a professional working relationship."

As you were also aware at the time, Mr. Huntsman was a felony suspect in a theft of electronic information investigation, which remains an active investigation at the Office of the Attorney General. You had an opportunity to relieve Mr. Huntsman of his duties then, but declined and the Board ignored my request. Unfortunately, your failure to address the issues I pointed out to you in 2021, has now resulted in an even more serious crime allegedly occurring, which is additionally under active investigation by the Office of the Attorney General.

On September 14, 2022, as you are likely aware, public corruption search warrants were served at multiple locations. During the service at Supervisor Shelia Kuehl's residence, she stated to reporters, "I heard from County Counsel last night that she got a tip from Max Huntsman that the search would happen this morning." In the event you have not heard the statement for yourself, it was aired by every local news channel, and it is posted on all Los Angeles County Sheriff's Department's social media accounts.

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1851 —

AV010479

The Honorable Board of Supervisors

-2-

September 21, 2022

Moreover, based on Supervisor Kuehl's statements and Attorney General Rob Bonta's announcement, Mr. Huntsman and the Los Angeles County Counsel have now become the focus of a criminal investigation by the Office of the Attorney General, and as such, the conflict of interest in Mr. Huntsman remaining in his current assignment is untenable. For these reasons, I demand that Mr. Huntsman be treated like any other of the over 100,000 Los Angeles County employees and be relieved of his duties, pending the outcome of the Attorney General's criminal investigation.

Given the above, it is the established pattern and practice everywhere in the Los Angeles County, by every department, that an employee is to be relieved of duty and/or reassigned upon reliable knowledge of alleged criminal activity, and an investigation is pending which could lead to termination.

Should you have any questions or would like to discuss further, please feel free to contact my Chief of Staff, John L. Satterfield, at [REDACTED]

Sincerely,

ALEX VILLANUEVA  
SHERIFF

AV010480

**ROB BONTA**  
*Attorney General*

*State of California*  
**DEPARTMENT OF JUSTICE**



1100 I Street  
P.O. Box 944266  
Sacramento, CA 95834-2366  
Telephone: [REDACTED]  
E-Mail Address: [REDACTED]

January 25, 2022

Timothy K. Murakami  
Undersheriff  
Office of the Sheriff  
County of Los Angeles  
Hall of Justice  
211 West Temple Street  
Los Angeles, CA 90012

VIA EMAIL AND U.S. MAIL

Re: Possible criminal conduct

Dear Undersheriff Murakami:

The Department of Justice (DOJ) is in receipt of your letters regarding possible criminal conduct. Specifically, we have received: (1) letters dated July 23, 2020, and October 20, 2021, regarding possible criminal conduct by Sachi Hamai; and (2) a letter dated November 16, 2021, regarding possible criminal conduct by five individuals who purportedly engaged in acts to "unlawfully obtain and distribute confidential, protected personnel records."

As to the former matter, you request that DOJ "conduct the criminal inquiry"; as to the latter, you implicitly request that DOJ conduct any necessary inquiry and review the matter, noting "the inherent conflict(s)" for further inquiry and asking that, should we decline "further inquiry or review," to refer the matter to a district attorney's office outside of Los Angeles County. DOJ will review these matters.

Additionally, it has come to our attention that your Office has been involved in a criminal investigation of Peace Over Violence and/or Executive Director Patti (Patricia) Giggans. Specifically, it has been reported that, in February and March 2021, your Office executed search warrants at the offices of Peace Over Violence and L.A. Metro as part of a criminal investigation. (E.g., Jason Henry, *LA County Sheriff Investigating Oversight Commissioner's Nonprofit, Search Warrants Show*, L.A. Daily News, June 18, 2021.)

AV010481

January 25, 2022  
Page 2

DOJ requests that your Office to provide a report on the status of the investigation of Peace Over Violence and/or Executive Director Parti (Patricia) Giggans. (Cal. Const., art V, § 13 [noting Attorney General has supervisory authority over sheriff and may require "reports concerning the investigation, detection, prosecution, and punishment of crime"].) Your cooperation in this request is appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Lance Winters", with a stylized flourish at the end.

Lance Winters  
Chief Assistant Attorney General

For ROB BONTA  
Attorney General

AV010482



# OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ALEX VILLANUEVA, SHERIFF



204  
BOS

February 18, 2021

The Honorable Board of Supervisors  
County of Los Angeles  
383 Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

Dear Supervisors:

## THE NEED FOR AN HONEST AND OBJECTIVE INSPECTOR GENERAL

The purpose of this communication is to advise you of my grave concerns with the conduct of your appointed Inspector General (IG), Max-Gustaf Huntsman, and the publications authored by his office which directly influence the unsuspecting public's perceptions regarding both the credibility of the Los Angeles County Sheriff's Department (Department) and the legitimacy of our operations. His zealot-like behavior continues to create civil liability for the County and potentially endangers the life of deputies in the field, as he artificially stokes animosity between the Department and the community.

In addition to potentially endangering the lives of our deputies, his intellectual dishonesty places the public at an increased risk. After utilizing good communication and de-escalation strategies, deputies can only ultimately perform the detention or arrest of an individual one of two ways: 1) The person voluntarily submits to lawful authority; or, 2) The person resists and the deputy uses force to overcome their resistance and gain safe control. As the public continues to be misled by Mr. Huntsman as to the Department being engaged in widespread "unlawful conduct," they are far less likely to voluntarily comply. Statistically, this in and of itself places members of the public in situations that are far less likely to have a peaceful resolution.

The expectation of the public regarding the conduct of an IG is they are dedicated to serving the public's interest by working tirelessly to fairly assess the operations of any given organization and provide meaningful input for reforms, which may be required to adapt to an ever-changing world. Indeed, the National Association of Inspectors General posits this public expectation is best served when:

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

A Tradition of Service  
— Since 1850 —

SCANNED & E-MAILED TO BOS LAISON  
TEAM 2/18/21

AV010483



The Honorable Board of Supervisors

-2-

February 18, 2021

This public expectation is best served by inspectors general when they follow the basic principles of integrity, objectivity, independence, confidentiality, professionalism, competence, courage, trust, honesty, fairness, forthrightness, public accountability, and respect for others and themselves (AIG Principles and Standards, pg. 3, 2014).

Please note the first two principles outlined above, integrity and objectivity. I will provide you a brief rundown of the fundamental defects of Mr. Huntsman's work product, starting with the most recent publications and working our way back towards the start of my administration.

The Office of Inspector General (OIG) report "Review and Analysis of Misconduct Investigations and Disciplinary Process" released in February 2021 suffers from multiple fatal defects, chief among them the fallacy of a study period (2015-2019) which encompasses two administrations without distinguishing and contrasting the data from both. Another fatal flaw is the use of individual cases in an anecdotal fashion as representative of the entire Department's operation without providing proper context with the totality of cases investigated and discipline rendered. A select quote from the introduction:

Notwithstanding the current Sheriff's assertions, we were not provided by the Sheriff, and in our review, we did not observe or find, any evidence of falsification of evidence or reports which resulted in the wrongful discipline of a department employee (pg. 4, 2021).

This statement is demonstrably false and illustrative of the nature of the report itself. The Department conducted an in-depth analysis of the Mandoyan case, which is now a public document, wherein it was proven that a key exculpatory witness was identified, interviewed, and the results concealed from both the Civil Service Commission and the employee fighting the discharge (see the Department's Case Analysis, October 1, 2019).

The next production from the OIG, "Report Back on Unlawful Conduct of the Los Angeles County Sheriff's Department" was a letter dated December 14, 2020, addressed to the Civilian Oversight Commission (COC), purportedly in response to a request from Commissioner Priscilla Ocen. The staidly sophomoric report amounted to nothing more than a rehash of current and past litigation and a torturous defense of the legal fallout from Mr. Huntsman's oversteps in a homicide investigation.

This report was designed exclusively as a political tool to discredit the Department and does not appear to have any legitimate purpose in oversight, transparency, or accountability. Perhaps the most startling false statement is the section subtitled

AV010484

The Honorable Board of Supervisors

-3-

February 18, 2021

"Failure to Investigate and Prohibit Deputy Secret Societies (pg 12): Mr. Huntsman has the Department's criminal and administrative investigations of the Kennedy Hall incident from former Sheriff Jim McDonnell's tenure, and he is aware that 26 employees were disciplined, including four who were terminated as a result of that administrative investigation. Mr. Huntsman is also aware of the Department's new policy regarding forming or participating in deputy subgroups, which was issued in February 2020 and is being vigorously enforced.

The preceding report, "The Right to Know Act: Los Angeles County Sheriff's Department Response to Police Transparency Reform" was published in November 2020, and in typical OIG fashion, deliberately used outdated information from January 2020 to make the false claim the Department was not complying with SB 1421. For the record, as of December 31, 2020, the Department achieved full compliance with SB 1421 with a 96.45 percent rate, a number Mr. Huntsman was well aware was in the making and far different than the 70 percent non-compliance rate he reported just a month earlier.

Mr. Huntsman is also aware of the issues the Department has had since the inception of SB 1421, with antiquated databases that do not communicate with each other and the severe lack of staffing to meet the new requirements (a failure of leadership by the previous administration). To wit, in a letter dated July 6, 2020, to former Board of Supervisors (BOS) Chair Supervisor Kathryn Barger, the Department outlined six different occasions where we requested additional resources through the Chief Executive Office and were denied repeatedly. It was only through cannibalizing different functions of the Department that we were able to muster enough personnel to satisfy SB 1421 and California Privacy Rights Act requests. Comparing our operation to Los Angeles Police Department's is a dishonest comparison based on disparate funding levels, IT infrastructure, and staffing levels.

Looking through the sheer number of reports authored by the OIG, a persistent pattern emerges wherein the OIG ignores Department investigations, results of investigations, and actions taken in response to complaints from the public. The November 17, 2020 report back to the COC regarding the alleged harassment of family members after fatal deputy-involved shootings is one example of this. The report negates in its entirety the concerns of the public over impromptu memorials and gang members loitering in the vicinities of their homes, concerns which were addressed properly by the Department's report.

Examining the OIG's report's table of contents alone since its inception reveals a deferential OIG during former Sheriff McDonnell's administration, with report titles of a generic and non-inflammatory nature, unlike those published during my administration.

AV010485

The Honorable Board of Supervisors

4

February 18, 2021

As a matter of fact, the OIG generated as many reports during my first two years in office as they did during all of former Sheriff McDonnell's tenure, and that includes the conspicuously "confidential" report Mr. Huntsman prepared to bury the potentially illegal actions of former Sheriff McDonnell's Assistant Sheriff, Mike Rothans, for his purchase of a stolen vehicle from a contracted tow company.

Without question, these "reports" would be rejected by any legitimate academic institution. They are filled with unproven allegations, anecdotal data, omissions, distortions, and an overall permeation of bias and intellectual dishonesty. They are truly not the level of accuracy and authenticity expected in County government. Furthermore, if my own deputies consistently authored documents at this level, they would at the very least be placed on a performance improvement plan, and in cases of deception, omission, and lack of honesty, an administrative investigation would be conducted. I believe the responsibility for performance and accountability issues with Mr. Huntsman belongs, in part, to the COC. Yet, they seem too hyper-focused on political activism and calls for my own resignation to focus on this duty.

Since taking office in December 2016, I have continued my reforms within the Department to enhance public safety and strengthen the ties within our communities. As the elected Sheriff serving the most populous county in the nation and employing nearly 18,000 employees, this is no easy task. Having inherited significant problems from past administrations, I remain committed to effecting positive change for the residents of Los Angeles County.

As the first progressive democratic sheriff, I have delivered on many of my campaign promises to bring reform and transparency to the Department. I have instituted major reforms regarding Immigration and Customs Enforcement (ICE), leadership diversity, wage theft, and the single most important commitment to transparency – body worn cameras. Although Mr. Huntsman authored multiple reports on the Department's cooperation with ICE, he became silent in light of the moratorium on all inmate transfers to ICE custody. Again, this amounts to false documentation by omission and does not serve to inform either the public or the Department.

As a result of these unethical reports, the Department is suffering irreparable damage, and our standing in the community is being undermined by continual misleading and false attacks. It should be of great concern to all of us that his actions are eroding public trust and creating a liability for the Department. His hopelessly biased reporting will only invite future frivolous lawsuits which the hardworking taxpayers will have to waste money defending, while at the same time artificially rising tensions in the community which can endanger the lives of our deputies. This was clearly evidenced by the brutal attack on our two Compton Transit Services Bureau deputies which horrified the entire nation.

AV010486

The Honorable Board of Supervisors

-5-

February 18, 2021

The IG serves an advisory role, just like the COC. When their efforts are driven by political agendas and not facts, they fail to serve the public's expectations of oversight and betray the reason for their existence. As a result, their work product does not inform the Department's operations and will not be considered of any value. The Department will continue, however, to provide both entities all the information they are legally entitled to receive.

As you have been advised in writing, the Department continues to investigate a data breach discovered at the beginning of 2019. The Legislature has enacted a statutory scheme defining the powers and duties of a sheriff (Government Code Sections 26800-26778). Section 26800 generally provides:

The sheriff shall preserve peace, and to accomplish this object may sponsor, supervise, or participate in any project of crime prevention, rehabilitation of persons previously convicted of a crime, or the suppression of delinquency.

A sheriff is also expressly authorized and directed to investigate public offenses that have been committed and to arrest and take before a magistrate all persons who have committed a public offense (Sections 26801-26802). There is no statutory scheme that places anyone, including members of the OIG, above the law. As such, it is with concern that I read a letter from Lawrence Middleton to County Counsel, who had retained him to purportedly provide legal guidance on this very issue. In his words:

Upon completing my analysis, I wanted to bring to Undersheriff Murakami's attention a number of issues and concerns that cause me to counsel against a continuation or escalation of the investigation. Most notably, as detailed below, because none of the potential charges being investigated are likely to lead to a successful criminal prosecution, Department personnel involved in the investigation could place themselves in jeopardy or criminal prosecution and/or civil liability if they continue (March 8, 2020).

This letter appears to be an attempt to intimidate, coerce, or otherwise dissuade the Department from carrying out our lawful duty and is unacceptable. It should be noted neither County Counsel nor Mr. Middleton has knowledge of the scope or details of the investigation, rendering such opinions ill-informed and ill-advised. I have recused myself from this inquiry and know of its details superficially.

The Department needs an IG who is not ethically compromised and is certified by the National Association of Inspectors General. I expect the work product of the OIG to adhere to professional standards as cited in the Association of Inspectors General's book, "Principles and Standards for Offices of Inspector General," also known as the Green Book. The public, the Department, and BOS all deserve accurate reporting

AV010487

The Honorable Board of Supervisors

6

February 18, 2021

which is not politically motivated. I ask the BOS to consider my concerns and replace the IG with one who is accredited, unbiased, and capable of maintaining a professional working relationship. The Department's reputation is being unfairly tarnished by the IG in his personal attacks towards us. We need an IG who is fair and objective, not inflammatory and controversial.

The Department is a national trendsetter on many important issues, such as the relationship between local law enforcement and federal immigration enforcement, combatting the spread of COVID-19 in congregate living facilities and super-spreader events, the Wage Theft Task Force, defending the community during periods of civil unrest, and transparency. Our efforts are often adopted as best practices by other law enforcement agencies throughout the nation. Our reputation is at stake. The IG's personal vendetta should not come at the expense of our dedicated employees who put their lives on the line each and every day in service to the community.

Should you have any questions or would like to discuss further, please feel free to contact me at [REDACTED]

Sincerely,

ALEX VILLANUEVA  
SHERIFF

AV010488

The Honorable Board of Supervisors

-7-

February 18, 2021

AV:JAV:ac  
(Office of the Sheriff)

c: Rodrigo A. Castro-Silva, County Counsel, Office of the County Counsel

AV010489

# **ATTACHMENT B**

AV010490

WERKSMAN JACKSON & QUINN LLP  
ALAN J. JACKSON (Bar No. 173647)  
CALEB E. MASON (Bar No. 246653)

888 W. 6<sup>th</sup> St. 4<sup>th</sup> Floor  
Los Angeles, California 90017

Attorneys for Los Angeles County Sheriff's Department

CONFORMED COPY  
ORIGINAL FILED  
Superior Court of California  
County of Los Angeles

SEP 22 2022

Sherril R. Cantor, Executive Officer/Clerk of Court  
By: Sheryl R. Humbert, Deputy

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES – CENTRAL DISTRICT

IN RE: SEARCH WARRANT SERVED  
ON OFFICE OF THE INSPECTOR  
GENERAL FOR THE LOS ANGELES  
COUNTY METROPOLITAN  
TRANSPORTATION AUTHORITY ON  
SEPTEMBER 14, 2022

Case No.: Misc. BH014167

(Hon. William C. Ryan – Department  
56W)

**DECLARATION OF MAX O.  
FERNANDEZ IN RESPONSE TO  
COURT'S ORDER DATED  
SEPTEMBER 20, 2022.**

Date: September 22, 2022  
Time: 1:30 p.m.  
Dept.: 56W

**DECLARATION OF SGT. MAX O. FERNANDEZ**

I, Max O. Fernandez, declare as follows:

1. I am employed as a sergeant for the Los Angeles County Sheriff's Department ("LASD"). I am assigned as the lead investigator in the Department's investigation of related to possible criminal conduct regarding the awarding of contracts to Peace Over Violence (POV) by the Metropolitan Transportation Authority (MTA) ("the Matter"). I am the affiant for the search warrants relating to the Matter. There are two: one signed on February 26, 2021, by Judge Ronald Coen. I am also the Affiant for the Search Warrant which was signed on September 8, 2022 by Judge Craig Richman. I

-1-

SUPPLEMENTAL DECLARATION OF SGT. MAX FERNANDEZ PURSUANT TO

AV010491



1 make this declaration from my own personal knowledge, and if called as a witness, I  
2 could and would testify competently to the facts stated below.

3 2. This Supplemental Declaration supplements my Declaration filed  
4 yesterday in this Matter. I make this Declaration in compliance with the Court's  
5 September 20, 2022 Order, to ensure that I have fully and completely addressed the  
6 questions raised by the Court. My prior Declaration addressed the Court's questions  
7 about the application for and issuance of the search warrants in this Matter. This  
8 Declaration provides additional information regarding Question No. 5: "Report what  
9 searches have already been conducted on any computer seized under the warrant, and  
10 who conducted the searches, and what information has been obtained."

11 3. I joined the LASD's Public Corruption unit in October 2020. This  
12 investigation was assigned to me on or about October 26, 2020. The investigation was  
13 opened a year before that, on or about September 11, 2019, when a whistleblower from  
14 the MTA contacted the LASD to report what she believed to be illegal conduct,  
15 including fraudulent conduct in directing contracts to politically connected individuals  
16 and entities; and retaliation against her for reporting same.

17 4. I have seen public statements reported in the media made by various public  
18 figures, alleging that this investigation is some sort of political payback by the Sheriff  
19 against Supervisor Kuehl because of recent political developments and disagreements.  
20 That allegation is false. I know that the allegation is false, because (1) I have worked on  
21 this investigation for two years, and the investigation was begun a year before that, in  
22 September 2019—long before the current political animosities developed; and most  
23 importantly (2) this investigation is based on provable facts, credible witness testimony,  
24 and an undisputed documentary record, that provides probable for the allegations that  
25 County contracts were improperly awarded to Ms. Giggans and POV. The full details of  
26 the investigation, including the evidence reviewed and witnesses interviewed, is set forth  
27 in the affidavit I presented to the court in support of the search warrants obtained in the  
28 Matter. That evidence is abundant and constitutes probable cause to believe that a crime

-2-

SUPPLEMENTAL DECLARATION OF SGT. MAX FERNANDEZ PURSUANT TO  
COURT'S ORDER DATED SEPTEMBER 20, 2022

AV010492

1 has been committed, in my professional opinion. This is a straightforward investigation  
2 of corruption in the expenditure of public funds—the sort of investigation that every law  
3 enforcement agency in the state conducts on a regular basis, and that prosecutorial  
4 agencies regularly prosecute. This investigation has been conducted throughout  
5 according to standard investigatory practices.

6 5. The full list of items seized during the searches of Supervisor Kuehl's and  
7 Ms. Giggans' residences is attached hereto as Exhibit 1. As noted in my previous  
8 Declaration (Paragraph 7), none of the materials seized in the search of the Office of  
9 Inspector General offices have been reviewed or imaged.

10 6. Exhibit 1 identifies each item, and states whether its contents were imaged.  
11 Items 20, 21, 22, 24, and 25 are paper records, and were not imaged. The technicians  
12 who worked on the imaging are: Thomas Ferguson; Leo Lo; John Moore; Steven  
13 Suarez; Mike Rivas; Julius Gomez; Raquel Gonzales; Claudia Iwasczysyn; and Brian  
14 Moreno. Those technicians did not review the contents of any device.

15 7. In sum: none of the contents of any computer seized have been reviewed.  
16 Of the total of 67 devices seized, 49 have been imaged, and one (1) has been partially  
17 imaged. All the imaging was conducted on September 14, 15, and 16, 2022. None of  
18 the contents of any of the devices have been reviewed, except for a review of recent text  
19 messages and voicemails on Supervisor Kuehl's phones as set forth below.

20 8. The only devices from which any content has been reviewed are the two  
21 phones seized from Supervisor Kuehl, and the only content reviewed from those phones  
22 were approximately 250 text messages and two voice mails. I personally conducted that  
23 review on the morning of September 16, 2022. I considered that review to be urgent for  
24 the reasons set forth below.

25 9. The review of the text messages and voicemails on Supervisor Kuehl's  
26 phone in the period prior to the execution of the warrant was urgent because at 8:00 a.m.  
27 on September 14, 2022, while deputies were still at her premises, Supervisor Kuehl gave  
28 a live television interview to Fox 11 News, in which she said the following: "KUEHL: I

-3-

SUPPLEMENTAL DECLARATION OF SGT. MAX FERNANDEZ PURSUANT TO  
COURT'S ORDER DATED SEPTEMBER 20, 2022

AV010493

1 heard from County Counsel last night that she got a tip from Max that this search would  
2 happen. REPORTER: Max Huntsman? KUEHL: Yes, from Max Huntsman that this  
3 search would happen this morning.”

4 10. In my professional opinion, and based on my training and experience,  
5 tipping off a target of a search warrant prior to the execution of the warrant is a crime.  
6 Penal Code section 148 prohibits obstructing officers in the execution of their duties,  
7 including serving search warrants; and Penal Code 168 prohibits public officials  
8 (prosecutors, judges, clerks, or peace officers) from disclosing the fact that a search  
9 warrant has been issued, prior to its execution, for the purpose of preventing the search  
10 or seizure of property. The only people who knew about the issuance of this search  
11 warrant when it was issued were among those enumerated categories. So, at a  
12 minimum, whoever told Max Huntsman about this warrant committed a crime.

13 11. In the concurrent search of Patricia Giggans' residence, which took place  
14 at the same time as the search of Supervisor Kuehl's residence, we were surprised to  
15 find that Ms. Giggans' phone was not present anywhere in the house or on her person.  
16 The search warrant was executed at 7 a.m. at Ms. Giggans' residence, and she was  
17 personally present when we arrived. Based on my training and experience, individuals  
18 keep their phones ready to hand, and I know that Ms. Giggans owns and uses an iPhone,  
19 because we have obtained numerous emails sent by her, which contain in the signature  
20 line the phrase, "Sent from my iPhone." I know from personal experience and from my  
21 training that that phrase is automatically inserted into emails sent from an iPhone. It is  
22 also not plausible or likely that Ms. Giggans would manually type that phrase into the  
23 bottom of every email she sends.

24 12. Because I know that Ms. Giggans has an iPhone, and her phone was not  
25 present in her residence or on her person, I concluded that the most likely explanation  
26 for the absence of her phone was that she was aware that the warrant was going to be  
27 executed, and she disposed of the phone in some manner beforehand. Ms. Giggans'  
28 attorney, Mr. Austin Dove, arrived at her residence approximately 15 minutes into the

-4-

SUPPLEMENTAL DECLARATION OF SGT. MAX FERNANDEZ PURSUANT TO  
COURT'S ORDER DATED SEPTEMBER 20, 2022

AV010494

1 search. Mr. Dove spoke with the detectives executing the warrant, and said the  
2 following: "There is no phone. You can search for the phone. You're entitled to search  
3 the place." That statement was made by Mr. Dove to Detective Yoon Nam, who told me  
4 about it that same day.

5 13. In addition to constituting a crime under the Penal Code, the act of tipping  
6 off a target of a search warrant to existence of the warrant is a major concern for the  
7 LASD. It creates safety and security risks for officers executing warrants, and it  
8 compromises and impairs the investigation of crimes. In short, we simply cannot have  
9 targets of warrants tipped off the night before. The fact that Supervisor Kuehl publicly  
10 stated she had been tipped off the night before was a serious concern for me and for the  
11 LASD, as to how the information had been obtained and disseminated.

12 14. Accordingly, I reviewed Ms. Kuehl's phones, looking for recent  
13 communications relating to the warrant. I found them. The relevant text messages are  
14 attached hereto as Exhibit 2.

15 15. At 10:17 p.m. on September 13, 2022, Lisa Mandel, Supervisor Kuehl's  
16 Chief of Staff, texted Supervisor Kuehl the following (the full message is attached in  
17 Exhibit 2): "Just got a call from Dawyn Harrison. She has been informed that the  
18 Sheriff may obtained a search warrant for your home and Patti G's.... Per the informant,  
19 the warrant is for 7 a.m. tomorrow. Let me know if you want me to do anything."

20 16. At 11:41 p.m. on September 13, 2022, Dawyn Harrison (who is Acting  
21 County Counsel) texted Supervisor Kuehl the following (the full message is attached in  
22 Exhibit 2): "Was the first my team heard of it. Max called CoCo tonight with his  
23 'intel.'" I know from personal experience and from my training that "CoCo" refers to  
24 County Counsel.

25 17. There are approximately 25 messages relating to the above two messages.  
26 And the two voicemails were from Ms. Harrison, also on the evening of September 13,  
27 2022. Both stated that she had an urgent matter that she needed to discuss with  
28 Supervisor Kuehl.

-5-

SUPPLEMENTAL DECLARATION OF SGT. MAX FERNANDEZ PURSUANT TO  
COURT'S ORDER DATED SEPTEMBER 20, 2022

AV010495

1           18. The other investigators who have reviewed the same set of text messages I  
2 reviewed from Supervisor Kuehl's phones are Detective Rafael Rafino and Lieutenant  
3 Oscar Veloz.

4           I declare under penalty of perjury under the laws of the State of California that  
5 the foregoing is true and correct.

6           Executed on September 21, 2022, in Los Angeles, California.

7   
8 MAX O. FERNANDEZ

## **EXHIBIT 1**

AV010497

CAT	ITEM #	QUAN	DESCRIPTION	DATE RECEIVED	IMAGED	PROCESSED	PORTABLE CASE	NOTES
EV	1	1	Computers, equipment, & accessories - [REDACTED] color, [REDACTED], with power cord; from Home Ofc Desk (LOC 6) Article: CABLE Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] DOJ File Control Number: [REDACTED] Booked At: OTHER	9/14/2022	Y	Y	N	
EV	2	1	Computers, equipment, & accessories - [REDACTED] Blk, w/cord; home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] DOJ File Control Number: [REDACTED] Booked At: OTHER	9/14/2022	N	N	N	No Data - Drive B/O
EV	3	1	Phones/Cell - Blk [REDACTED] blk/gry case (cracked screen protector); IEMI [REDACTED]; Master BR (LOC 6) Article: Cell Phone Make: [REDACTED] Model: Unknown Serial Number: Unknown Booked At: OTHER	9/14/2022	N	N	N	No Extraction

AV010498

EV	4	1	Computers, equipment, & accessories - Silv USB "Homeboy Industries"; center drawer of home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Not Applicable Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/14/2022	Y	N	N	No Data in Date Range
EV	5	1	Computers, equipment, & accessories - Blu USB "[REDACTED]"; Top LT drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Not Applicable Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/14/2022	Y	Y	Y	
EV	6	1	Computers, equipment, & accessories - Blk/Silv USB "[REDACTED]"; Top LT drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Unknown Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/14/2022	Y	N	N	No Data in Date Range
EV	7	1	Computers, equipment, & accessories - Blk/Silv USB "[REDACTED]"; Top LT drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Unknown Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/14/2022	Y	N	N	

AV010499



EV	8	1	Computers, equipment, & accessories - Silv/Wht USB "Futures without violence"; LT middle drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Unknown Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/14/2022	Y	N	N	
EV	9	1	Computers, equipment, & accessories - Silv/Wht USB "Futures without violence"; LT middle drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Unknown Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/14/2022	Y	N	N	
EV	10	1	Computers, equipment, & accessories - Blk, [REDACTED] Ultra, 8GB in clear case, Prod Code [REDACTED] Top LT drawer home ofc desk (LOC 6) Article: SD CARD Make: [REDACTED] Model: Unknown Serial Number: Unknown Booked At: OTHER	9/14/2022	Y	Y	Y	
EV	11	1	Computers, equipment, & accessories - Red USB "denimdayusa.org"; LT middle drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Unknown Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/14/2022	Y	Y	Y	

AV010500

EV	12	1	Computers, equipment, & accessories - Blu USB with silv color lanyard "AVB"; LT middle drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Unknown Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/14/2022	Y	Y	N	No Data in Date Range
EV	13	1	Computers, equipment, & accessories - L.Blu PNY USB, 8GB, w/blk lanyard; LT middle drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: PNY Model: Unknown Serial Number: Unknown Booked At: OTHER	9/14/2022	Y	Y	N	No Data in Date Range
EV	14	1	Computers, equipment, & accessories - Wht/Red triangle shaped USB "GUESS logo"; LT middle drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Unknown Model: Unknown Serial Number: Unknown Booked At: OTHER	9/14/2022	Y	N	N	No Data in Date Range
EV	15	1	Other - Silv [REDACTED] Digital Voice Recorder, [REDACTED] [REDACTED]; LT middle drawer home ofc desk (LOC 6) Serial Number: Unknown Booked At: OTHER	9/14/2022	N	N	N	No Data in Date Range

AV010501

EV	16	1	Phones/Cell - [REDACTED] Cellphone; top middle dresser drawer in SW BR (LOC 6) Article: Cell Phone Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] DOJ File Control Number: [REDACTED] Booked At: OTHER	9/14/2022	Y	Y	Y	
EV	17	1	Phones/Cell - [REDACTED], IMEI [REDACTED]; top middle dresser drawer in SW BR (LOC 6) Article: Cell Phone Make: [REDACTED] Serial Number: Unknown Booked At: OTHER	9/14/2022	N	N	N	No Extraction
EV	18	1	Phones/Cell - Rose Gold color, LG cell phone, top middle dresser drawer in SW BR (LOC 6) Article: Cell Phone Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] DOJ File Control Number: [REDACTED] Booked At: OTHER	9/14/2022	Y	Y	Y	
EV	19	1	Computers, equipment, & accessories - Silv MacBook Pro Laptop with multiple stickers; RT bottom dresser drawer SW BR (LOC 6) Article: LAP TOP COMPUTER Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] DOJ File Control Number: [REDACTED] Booked At: OTHER	9/14/2022	Y	N	N	Encrypted
	20	0			N	N	N	Not Booked at CIC

AV010502

	21	0			N	N	N	Not Booked at CIC
	22	0			N	N	N	Not Booked at CIC
EV	23	1	Phones/Cell - [REDACTED] Article: Cell Phone Make: [REDACTED] Model: [REDACTED] Serial Number: Unknown Booked At: DETECTIVE BUREAU	9/15/2022	Y	Y	Y	
	24	0			N	N	N	Not Booked at CIC
	25	0			N	N	N	Not Booked at CIC
EV	26	1	Computers, equipment, & accessories - Envelope containing black External Hard Drive, [REDACTED] Black plastic, 1 TB located in "Patty Giggins" Office. Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	Y	N	N	Terminated per Warrant
EV	27	1	Computers, equipment, & accessories - [REDACTED] Desktop, Silver plastic, located in Patty Giggins Office. Article: COMPUTER DISPLAY SCREEN/MONIT Make: [REDACTED] Model: Desktop Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	Y	N	N	

AV010503

EV	28	1	Computers, equipment, & accessories - Thumbdrive, "██████████", Black plastic with Purple Tether Cord located in Operations Office Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: ██████████ Model: ██████████ Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	29	1	Computers, equipment, & accessories - Thumbdrive, "██████████", Black plastic with Purple Tether Cord located in Operations Office Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Centon Model: ██████████ Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	N	N	Cloned Only
EV	30	1	Computers, equipment, & accessories - Main Server, "Dell Power Edge T-710, gray located in Server Room Article: COMPUTER (CPU) Make: ██████████ Model: ██████████ Serial Number: ██████████ Booked At: OTHER	9/16/2022	Partial	Partial	N	Terminated per Warrant
EV	31	1	Computers, equipment, & accessories - ██████████ computer tower taken from Soils's office during MTA search warrant. Service Tag ██████████ Article: COMPUTER (CPU) Make: ██████████ Model: ██████████ Serial Number: Unknown Booked At: PATROL STATION	9/16/2022	Y	Y	Y	

AV010504

EV	32	1	Computers, equipment, & accessories - [REDACTED] Laptop from wiggins office during MTA search warrant Article: LAP TOP COMPUTER Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] Booked At: PATROL STATION	9/16/2022	Y	Y	Y	
EV	33	1	Computers, equipment, & accessories - blk/sil METRO thumbdrive from wiggins office from MTA search warrant Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Not Applicable Model: Unknown Serial Number: Not Applicable Booked At: PATROL STATION	9/16/2022	Y	Y	Y	
EV	34	1	Computers, equipment, & accessories - [REDACTED] computer tower from wiggins office from MTA search warrant, [REDACTED] Article: COMPUTER (CPU) Make: [REDACTED] Model: [REDACTED] Serial Number: Unknown Booked At: PATROL STATION	9/16/2022	Y	Y	Y	
EV	35	1	Computers, equipment, & accessories - Blk/Sil [REDACTED] laptop from solis's office during MTA search warrant. Article: LAP TOP COMPUTER Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	Y	Y	Y	

AV010505

EV	36	1	Computers, equipment, & accessories - Blk/Sil [REDACTED] computer tower from Soli's office during MTA search warrant. [REDACTED] Article: COMPUTER (CPU) Make: [REDACTED] Model: [REDACTED] Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	37	1	Computers, equipment, & accessories - Blk/Sil [REDACTED] computer tower from Avila's office during MTA search warrant. [REDACTED] Article: COMPUTER (CPU) Make: [REDACTED] Model: [REDACTED] Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	N	N	
EV	38	1	Computers, equipment, & accessories - Blk/Sil [REDACTED] Computer tower from Bercerra's office during MTA search warrant. [REDACTED] Article: COMPUTER (CPU) Make: [REDACTED] Model: [REDACTED] Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	N	N	
EV	39	1	Computers, equipment, & accessories - Sil/Org portable hard drive from Decerra's office during MTA search warrant and blk cable Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: Not Applicable Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	N	N	N	Not Assigned Not in Search Warrant

AV010506

EV	40	1	Computers, equipment, & accessories - Sll/Yiw 2GB [REDACTED] thumbdrive from Becerra's office during MTA search warrant Article: EXTERNAL DRIVES (HAND DRIVE, USB) Make: Not Applicable Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	41	1	Phones/Cell - Blk apple cellphone from Becerra's office during MTA search warrant. Sim card attached to back. Article: Cell Phone Make: [REDACTED] Model: [REDACTED] Serial Number: Unknown Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	42	1	Computers, equipment, & accessories - Blk/Sll [REDACTED] computer tower from Hernandez's office during MTA search warrant. [REDACTED] Article: COMPUTER (CPU) Make: [REDACTED] Model: [REDACTED] Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	N	N	
EV	43	1	Computers, equipment, & accessories - Blk [REDACTED] 500GB drive from Herandez's office, inside plastic wrap belonging to Jeniffer Loew. Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	Y	Y	Y	

AV010507



EV	44	1	Computers, equipment, & accessories - Blk/Sil [REDACTED] computer tower from Hernandez's office during MTA search warrant. [REDACTED] Article: COMPUTER (CPU) Make: [REDACTED] Model: [REDACTED] Serial Number: Not Applicable Booked At: OTHER	9/16/2022	N	N	N	Not Booked at CIC
EV	45	1	Computers, equipment, & accessories - 2 red/blk 32GB [REDACTED] thumbdrives from Hernandez's office. Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	
A38	46	1	Computers, equipment, & accessories - red/blk 4GB Innovera thumbdrive from Hernandez's office Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	N	N	
EV	47	1	Computers, equipment, & accessories - blk 32GB [REDACTED] thumbdrive from Hernandez's office Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	

AV010508

EV	48	1	Computers, equipment, & accessories - whi/grn █████ 64GB thumbdrive from Hernandez's office Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: █████ Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	49	1	Computers, equipment, & accessories - Sii/Blk/Whi METRO thumbdrive from Hernandez's office Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Not Applicable Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	N	No Data in Date Range
EV	50	1	Computers, equipment, & accessories - Blk/Sil █████ computer tower from Englund's office. S █████ Article: COMPUTER (CPU) Make: █████ Model: █████ Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	N	N	
EV	51	1	Computers, equipment, & accessories - red/sil 8GB thumbdrive from Englund's office during MTA search warrant. Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Not Applicable Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	

AV010509

EV	52	1	Electronics (audio, TV) - blk sanyo tape recorder from kuehl's house Article: Other Make: [REDACTED] Model: [REDACTED] Serial Number: Not Applicable Booked At: OTHER	9/16/2022	N	N	N	No Date in Date Range
EV	53	1	Computers, equipment, & accessories - Silver [REDACTED] computer Article: LAP TOP COMPUTER Make: [REDACTED] Model: Unknown Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	N	N	N	Encrypted
EV	54	1	Computers, equipment, & accessories - SILVER APPLE COMPUTER Article: LAP TOP COMPUTER Make: [REDACTED] Model: Unknown Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	N	N	N	Partial Image
EV	55	1	Phones/Cell - rose gold [REDACTED] cellphone with blu case taken from Kuehl's residence. Article: Cell Phone Make: [REDACTED] Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	

AV010510

EV	56	1	Computers, equipment, & accessories - SILVER [REDACTED] COMPUTER Article: LAP TOP COMPUTER Make: [REDACTED] Model: Unknown Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	57	1	Computers, equipment, & accessories - sil [REDACTED] cd drive and whi cable from kuehl's residence Article: OTHER Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	N	N	N	CD Player
EV	58	1	Phones/Cell - ROSE GOLD [REDACTED] Article: Cell Phone Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	N	N	N	Damaged Phone/No Extraction
EV	59	1	Computers, equipment, & accessories - sil [REDACTED] BOGB computer drive Article: OTHER Make: [REDACTED] Model: [REDACTED] Serial Number: Not Applicable Booked At: OTHER	9/16/2022	N	N	N	Damaged Phone/No Extraction
EV	60	1	Cameras: Equip & Access - sil nikon coolpix digital camera from kuehl's residence Article: CAMERA Make: nikon Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	N	N	

AV010511

EV	61	1	Cameras: Equip & Access - blk [REDACTED] 5x110 digital camera from kuehls residence. Article: CAMERA Make: [REDACTED] Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	62	1	Computers, equipment, & accessories - red [REDACTED] 4 GB thumbdrive with zelda paperwork from kuehls residence Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: sandisk Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	N	N	
EV	63	1	Computers, equipment, & accessories - blu 16GB [REDACTED] thumbdrive from kuehls residence Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	64	1	Computers, equipment, & accessories - USB DRIVE [REDACTED] 1GB Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	Y	N	N	

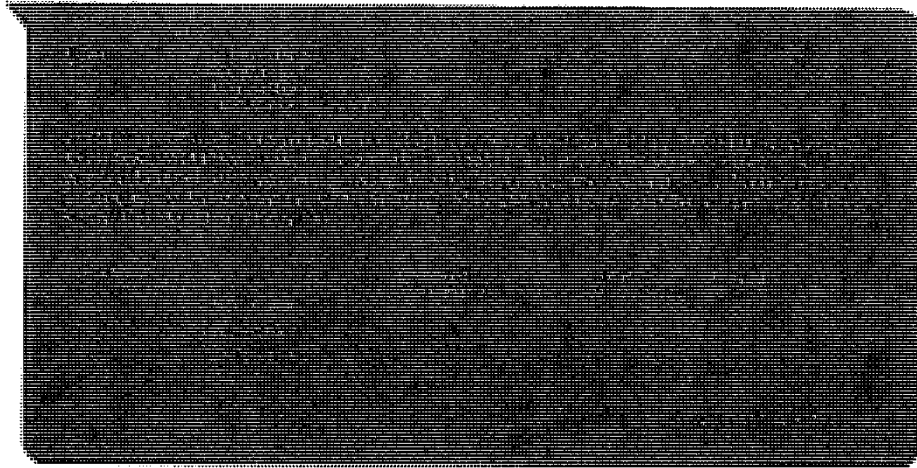
AV010512

EV	65	1	Computers, equipment, & accessories - whi 256GB [REDACTED] thumbdrive from kuehls residence Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	66	1	Computers, equipment, & accessories - USB DRIVE 1GB Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: SCAN DISK Model: [REDACTED] Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	Y	N	N	
EV	67	1	CDs/Video - cd disc labeled LA political roast from kuehls residence Booked At: OTHER	9/16/2022	N	N	N	Not Assigned Not in Search Warrant

AV010513

## **EXHIBIT 2**

AV010514



AV010515



**PROOF OF SERVICE - 1013A(3), 2015.5 C.C.P.)**

STATE OF CALIFORNIA )  
 ) ss.  
COUNTY OF LOS ANGELES )

I am employed in the County of Los Angeles, State of California a over th ag o f an no part t th withi  
action m busines addres i 88 Wes Sixt Street Suit 400 Lo Angeles Californi 90017

O Septembe 22 2022, I serv d t e foregoi g document, described as

**SUPPLEMENTAL DECLARATION OF SG., MAX FERNANDEZ UR UANT TO COUR 'S  
O DER DATED SEP EMBER 0, 022**

on all interest d partes li te below by tr ns itting to all nterest d partes a true co y hereof as follows:

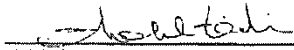
<b>Cheryl O'Connor, Esq.</b> JONES DAY 3161 Michelson Drive, Suite 800 Irvine, CA 92612 [REDACTED]	<b>Robert Dugdale, Esq.</b> KENDALL BRILL & KELLY LLP 10100 Santa Monica Blvd., Suite 1725 Los Angeles, CA 90067 [REDACTED]
<b>Harvinder S. Anand, Esq.</b> ANAND LAW GROUP 790 E. Colorado Blvd., # 900 Pasadena, CA 91101 [REDACTED]	<b>Dawyn Harrison, Esq.</b> Office of the County Counsel, 648 Hahn Hall of Admin. 500 W Temple St, Los Angeles, CA 90012 [REDACTED]

☒ **BY MAIL** by placing a true copy thereof enclosed in a sealed envelope addressed as set forth above. I am  
readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it  
would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles,  
California in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid  
if postal cancellation date or postage meter date is more than one (1) day after date of deposit for mailing in affidavit.

☒ **BY ELECTRONIC TRANSMISSION** by transmitting a PDF version of the document(s) by electronic mail to the  
party(s) identified on the service list using the e-mail address(es) indicated

☒ I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on September 22, 2022, in Los Angeles, California

  
Michele K irk

AV010516

# **ATTACHMENT C**

AV010517



COUNTY OF LOS ANGELES  
OFFICE OF THE COUNTY COUNSEL

645 KENNETH HAHN HALL OF ADMINISTRATION  
590 WEST TEMPLE STREET  
LOS ANGELES, CALIFORNIA 90012-2713

DAWYN R. HARRISON  
Acting County Counsel

September 21, 2022

TELEPHONE

FACSIMILE

TDD

CONFIDENTIAL

THIS MATERIAL IS SUBJECT TO THE  
ATTORNEY-CLIENT AND/OR THE ATTORNEY  
WORK PRODUCT PRIVILEGES

VIA EMAIL AND U.S. MAIL

The Honorable Alex Villanueva  
Sheriff, Los Angeles County  
211 West Temple Street, 8<sup>th</sup> Floor  
Los Angeles, California 90012

Re: Response to Your September 20, 2022 Letter

Dear Sheriff Villanueva:

This in response to your letter dated September 20, 2022, stating you are refusing Bill Seki as counsel for the County of Los Angeles Sheriff's Department ("LASD") and engaging the appropriate counsel.

First, all the issues raised in your letter are moot. Yesterday, California Attorney General Rob Bonta notified Undersheriff Murakami that his office is assuming responsibility for: a) any investigation into whether individuals committed a crime by giving advance warning of the search warrants to Supervisor Kuehl and Patricia Giggans; and b) the underlying investigation of Peace Over Violence, Patricia Giggans, Supervisor Sheila Kuehl, Los Angeles Metropolitan Transportation Authority, etc., including the warrants issued in 2021 and 2022. As you acknowledged previously, the Attorney General has the authority to assume these responsibilities because he has complete supervisorial authority over you and may direct your and LASD's investigative activities. In the Attorney General's letter he stated the LASD "should cease its investigative activity and refrain from any actions in furtherance of these investigations, including public statements or court filings related to the investigations." Based on that directive, you did not have authority to send your September 20, 2022, letter, nor does the LASD require legal services relating to the continued investigation by the Attorney General. To the extent that counsel is required for the LASD to explain prior conduct in connection with the 2021 and 2022 warrant proceedings, Mr. Seki will continue to represent the LASD.


HQA 103648555 5

AV010518

The Honorable Alex Villanueva  
September 21, 2022  
Page 2

Second, I wanted to remind you that only the Office of County Counsel, or the law firms we retain, may represent you, in your official capacity, and the LASD.<sup>1</sup> Further, even if all of the requirements of Government Code section 31000.6 – Employment of Legal Counsel to Assist Assessor or Sheriff; Conflicts of Interest – are met and conflict of interest counsel is deemed appropriate for you in your official capacity, the conflict counsel must be retained through my office.<sup>2</sup> Therefore, you have no authority to retain your own counsel to represent either you or the LASD, nor is the County of Los Angeles responsible for any of the costs incurred by those law firms. I recently discovered that you improperly retained Werksman Jackson & Quinn LLP in this matter. I will notify them that they have no authority to represent you or LASD and will not be paid by the County of Los Angeles, and I will copy the Attorney General's Office.

Very truly yours,

  
DAWYN R. HARRISON  
Acting County Counsel

DRH:gl

Enclosures

c: Timothy K. Murakami, Undersheriff

John L. Satterfield, Commander  
Chief of Staff

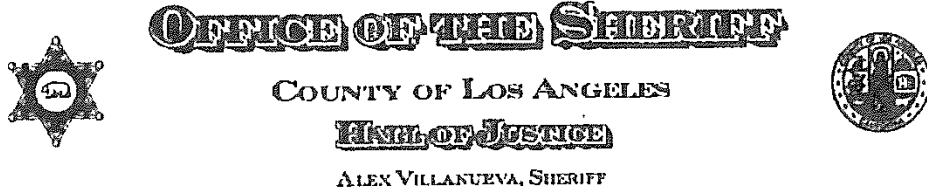
---

<sup>1</sup> Government Code section 25203 establishes that the board of supervisors shall "direct and control the conduct of litigation in which the county, or any public entity of which the board is the governing body, is a party." Los Angeles County Charter Article VI, section 21 vests County Counsel with "exclusive charge and control of all civil actions and proceedings in which the County or any officer thereof, is concerned or is a party" (footnotes omitted). By law, the Office of County Counsel is charged with providing legal advice, on behalf of the Board, to constituent entities and officials within the County. California Government Code section 23005 (County exercises authority "only through the board of supervisors" or its authorized agents); id. § 25203 (the Board shall "direct and control the conduct of litigation in which the county, or any public entity of which the board is the governing body, is a party"); Los Angeles, California, County Charter Article VI, section 21 (County Counsel is vested with "exclusive charge and control of all civil actions and proceedings in which the County or any officer thereof, is concerned or is a party" (footnotes omitted)).

<sup>2</sup> Government Code section 31009.6. Please see the attached orders from *County of Los Angeles v. Sheriff Alex Villanueva, et al.* regarding assignment of counsel.

HQA 103848555 5

AV010519



September 20, 2022

Dawyn Harrison, Acting County Counsel  
County of Los Angeles – Office of the County Counsel  
500 West Temple Street, Suite 648  
Los Angeles, California 90012

Dear Ms. Harrison:

**DEMAND FOR DEFENSE COUNSEL**

It appears clear you have no intention of removing your office's control as counsel to the Department on this matter. Unless I misunderstood, you insist we continue to communicate and seek advice from your Senior Assistant County Counsel, Mr. Jason Gonzalez, and Mr. Bill Seki, as stated in your letter.

As you are aware, the morning of the search warrant service Supervisor Shelia Kuehl stated to reporters, *"I heard from County Counsel last night that she got a tip from Max Huntsman that the search would happen this morning."* In the event you have not heard the statement for yourself, it was aired by every local news channel, and it is posted on all LASD social media accounts.

Ms. Kuehl's allegation that you, or a representative from your office, and Mr. Huntsman provided her with advanced knowledge of a criminal search warrant in which she was a suspect makes it unethical and inappropriate for your office to have further access to information or decision making regarding this matter. Moreover, by retaining the services of Bill Seki, there is a clear further potential for you, or your office, to interfere in the filing of motions and overall employment status of Mr. Seki. I must also highlight, based on Supervisor Kuehl's statements and Attorney General Rob Bonta's announcement today, both you and your office are likely to become the focus of a criminal investigation by the Office of the Attorney General, and as such the conflict of interest is undeniable.

Since you intend to continue blocking any independent counsel, we are forced to seek appropriate counsel in order to prevent further interference and/or obstruction of our investigation by your office. Under the State Bar Rule 1.6, the potential for Mr. Seki to report information or communications to your office, and seek approval or denial for legal strategy, regarding our investigation disqualifies him as counsel. Based on this, we can no longer accept Mr. Seki as counsel and decline his further legal services.

AV010520

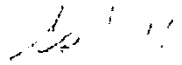
Ms. Harrison

-2-

September 20, 2022

If I misunderstood your position, please advise. Due to the exigency of this pending matter, the Department will engage the appropriate counsel and inform you once retained. Should you have any questions, please contact Undersheriff Timothy Murakami, at [REDACTED]. Thank you for your anticipated cooperation with this matter.

Sincerely,



ALEX VILLANUEVA  
SHERIFF

AV:JLS:js

c: Jason Gonzalez, Senior Assistant County Counsel

AV010521



COUNTY OF LOS ANGELES  
OFFICE OF THE COUNTY COUNSEL

648 KENNETH HAHN HALL OF ADMINISTRATION  
500 WEST TEMPLE STREET  
LOS ANGELES, CALIFORNIA 90012-2711

DAWYN R. HARRISON  
Acting County Counsel

September 20, 2022

CONFIDENTIAL

THIS MATERIAL IS SUBJECT TO THE  
ATTORNEY-CLIENT AND/OR THE ATTORNEY  
WORK PRODUCT PRIVILEGES

TELEPHONE

FACSIMILE

TDD

VIA EMAIL AND U.S. MAIL

The Honorable Alex Villanueva  
Sheriff, Los Angeles County  
211 West Temple Street, 8<sup>th</sup> Floor  
Los Angeles, California 90012

**Re: Response to Your September 19, 2022 Letter**

Dear Sheriff Villanueva:

I am in receipt of your letter from yesterday requesting counsel to handle the court proceedings related to the warrants issued on Wednesday, September 14, 2022 ("2022 Warrants"). After reviewing the letter, I believe Undersheriff Murakami has not had a chance to let you know that Bill H. Seki, a partner at Seki, Nishimura & Wataac, was assigned to handle the 2022 Warrants matters last week. It was our understanding, based on your and Undersheriff Murakami's press statements, that you were recused from handling the 2022 Warrants. As a result, we communicated directly with Undersheriff Murakami about assigning the defense of the 2022 Warrants to Mr. Seki and his firm on September 16, 2022, the day he made a request for counsel. Your department did not seek my office's assistance when it prepared the 2022 Warrants nor did it request to use Mr. Seki's professional services to assist in the preparation of the 2022 Warrants. Therefore, we had to quickly gather the necessary facts and perform an ethical and legal review when the Undersheriff requested counsel on September 16, 2022.

By way of background, Mr. Seki has been representing your department on the warrants issued in February and March of 2021 to the Los Angeles County Metropolitan Transportation Authority (Metro), Office of the Inspector General of the Metro (OIG), and Peace Over Violence ("2021 Warrants") since March 2021. Mr. Seki has actively responded to multiple motions challenging the warrants,

HOA 103845887.3

AV010522

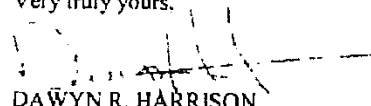
The Honorable Alex Villanueva  
September 20, 2022  
Page 2

communicated with your department about the warrants, and made several appearances defending the warrants for your department, including the last one in front of the Honorable Eleanor Hunter on September 1, 2022, addressing the scope of the 2021 Warrants and ordering the assignment of a Special Master.

When Mr. Seki was retained to provide his professional services for the 2021 and 2022 Warrants, confidentiality silos were created. Those confidentiality silos are in effect and will remain that way until the conclusion of these matters. As to the other claims you make in your letter, I deny them and will not further acknowledge them with a response.

If you have any questions about the 2021 or 2022 Warrants, please contact Mr. Seki at [REDACTED], or Senior Assistant County Counsel Jason Gonzalez at [REDACTED].

Very truly yours,

  
DAWYN R. HARRISON  
Acting County Counsel

DRH:gl

c: Timothy K. Murakami, Undersheriff

John L. Satterfield, Commander  
Chief of Staff

HOA.103846X87.3

AV010523





Ms. Harrison

-2-

September 19, 2022

Moreover, Government Code § 993.2 (b), provides in part: If an employee or former employee requests in writing that the public entity, through its designated legal counsel, provide for a defense, the public entity shall, within 20 days, inform the employee or former employee whether it will or will not provide a defense, and the reason for the refusal to provide a defense.

Furthermore, as you are also aware, Government Code § 25303 provides in part: This section shall not be construed to affect the independent and constitutionally and statutorily designated investigative and prosecutorial functions of the sheriff and district attorney of a county. The board of supervisors shall not obstruct the investigative function of the sheriff of the county nor shall it obstruct the investigative and prosecutorial function of the district attorney of a county.

Finally, Los Angeles County Code of Ordinances § 6.44.190, provides in part: The OIG shall not disclose, without the Sheriff's authorization, any of the Sheriff's Department's confidential personnel, investigative, or disciplinary information unless such information is already a matter of public record.

Should you fail to provide defense counsel in this matter, I will ask the court to order you, on behalf of the Board of Supervisors, to comply with their obligation by a Petition for Writ of Mandate.

As you are also aware, if you deny my demand for counsel, I am entitled to recover from the public entity such reasonable attorney's fees, costs and expenses as are necessarily incurred in defending the action or proceeding if the action or proceeding arose out of an act or omission in the scope of his employment as an employee of the public entity. See, Sparks v. Kern County (2009) 173 Cal App. 4th 194.

Your response in writing is due by the end of the next business day from the date of this letter, Tuesday, September 20, 2022. Upon receipt, we will advise of the firm of my choosing. Should you have any questions, please contact my Chief of Staff, Commander John Satterfield, at [REDACTED]. Thank you for your anticipated cooperation with this matter.

Sincerely,

  
ALEX VILLANUEVA  
SHERIFF

AV010525

Fwd: Latest MTA/Kuehl/Giggans warrants

From: [REDACTED]@counsel.lacounty.gov>  
Sent: Wednesday, September 18, 2022 5:39 PM  
To: [REDACTED]@law.com>  
Cc: [REDACTED]@counsel.lacounty.gov>  
Subject: Latest MTA/Kuehl/Giggans warrants

Hi Bill

I know you've had some conversations with Lina today about the newest round of warrants served by LASD this morning in the MTA/Kuehl/Giggans matter, and I just wanted to advise that County Counsel is not currently authorizing you to appear/work on those warrants on behalf of the Sheriff's Department. Please let me know if you have any questions. Thanks,

[REDACTED]

[REDACTED]

Assistant County Counsel

[REDACTED] Division

AV010526



Los Angeles County Sheriff's Department

September 16, 2022 11:49 AM

...

#### LA County Counsel Terminates LASD's Lawyer Same Day Supervisor Kuehl's Warrant Is Challenged in Court

In an unprecedented move of retaliation after Wednesday's lawful service of a search warrant on the residence of Supervisor Shelia Kuehl and others, the Board of Supervisor's Office of County Counsel has terminated the services of LASD's legal representation. Simply put, the Board of Supervisors and County Counsel fired our lawyer the same day our search warrant was challenged in court and an emergency hearing was set for September 22, 2022.

This is exactly the type of obstruction, interference, and political shenanigans which Sheriff Alex Villanueva fights against daily. We are now forced into a position of being unrepresented with no County authorization to pay for legal representation and reduced to solicit pro bono representation in this matter.

If Supervisor Shelia Kuehl, Commissioner Patty Giggins, The Board of Supervisors, County Counsel and the Office of the Inspector General are as committed to transparency and accountability as they continuously state, then why are they scared for these electronic devices to be examined and fighting the search warrant?

Feed: Latest MTA/ark-sh: Giggins warrants

From: [REDACTED]  
To: [REDACTED]  
Subject: [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

AV010527

# **ATTACHMENT D**

AV010528

761551N25A SH AD 32A (2/72)

COUNTY OF LOS ANGELES  
**SHERIFF'S DEPARTMENT**

"A Tradition of Service"

OFFICE CORRESPONDENCE

DATE: December 17, 2004

FILE NO.

FROM: ALEX VILLANUEVA, SERGEANT CARSON STATION	TO: DIVISION CHIEFS AND COMMANDERS
---	------------------------------------

SUBJECT: AN OPEN LETTER

The purpose of this memorandum is to dispel any rumors and inform you of my intentions regarding my future with our Department. As you all well know, I have been exhausting all administrative remedies to address my denial of promotion stemming from the 2003 Lieutenant Examination, and now I have read the most recent Intent to Promote teletype for lieutenants. As expected, I was not included on this list for reasons you know in more detail than I do, as I can only speculate what transpires behind closed doors.

Up to this point in time my experience, education, leadership, and communication skills have always served me well. During my ten years experience with the United States military I was privileged to have been promoted six times to positions of higher rank and responsibility. Perhaps this experience has burnished in me an expectancy of merit based promotions, and this expectancy was unrealistically carried over to our Department.

From what I have come to understand regarding ethical administrative behavior, I find no legal or moral justification for the activities you have engaged in over the course of the last year and a half. From rewriting oral interview scoring standards in order to deliberately suppress exam scores, providing secret exam preparation classes for the privileged few, and gaming the appeals process in order to gerrymander the candidate pool, you have compromised your integrity and that of the Department's.

Perhaps you have succumbed to a moral inversion, wherein you believe your actions and those of your peers are in the best interest of the Department and supported by civil service rules. Your decision making is a result of group-think and the feeling of infallibility, making it difficult for you to see beyond your own career success. I want to encourage each and every one of you to take a moment and engage in critical reflexivity, the ability to see the organization through someone else's experience.

Page 1 of 2

AV010529

My organizational experience has told me that I do not count, no matter what my qualifications may be, how hard I work, or how many bright ideas I possess. I do not get "invited" to apply to jobs, nor are jobs created exclusively for me. There is no captain or higher pushing aside more qualified individuals in order to make room for me, or steering me in the "right" direction. There is no rater who overlooks my shortcomings and gives me undeserved outstanding evaluations or 100 AP's. My queries are addressed with attorneys and mind-numbing technical rationality.

Promoting dozens of individuals to the rank of lieutenant is a wonderful opportunity to assert organizational values such as meritocracy, equality, and diversity, while at the same time promoting efficiency and effectiveness, and boosting the moral of the Department. Instead you deliberately chose the values of cronyism, nepotism, and tokenism. These have been the same values you have been espousing with just about every promotional process within our ranks. This negatively impacts public safety by promoting corruption and incompetence.

I am curious to know just how much public resources you will squander as you attempt to defend the indefensible. Deliberately attempting to suppress or retard the upward mobility of Latinos on our Department is illegal, immoral, and politically incomprehensible. Each and every one of you contributes to this unfolding tragedy by your actions or inactions. I will say this: as a Latino, I do not seek special favors, accommodations, or any sort of "affirmative action" in order to receive a promotion. I expect to be promoted because there is a clearly identified universal standard based on bonafide occupational qualifications, not golf handicaps or quotas.

It has been painful watching you lie, obfuscate, conceal, mislead, or otherwise attempt to hide the truth. I want to encourage you to come to grips with the damage you inflict on our institution, and do what's right. In an interesting parallel to our Department, NASA swore after the Challenger tragedy that it should never happen again, then along came Columbia. After spending over \$30 million addressing Bouman, it is truly frightening to behold how little has been learned.

Leadership is defined by action, not position, and I plan to act decisively to assert my rights, not only as an employee, but as a citizen and proud resident of this County. Your legacy and the future of equality and equal opportunity in Los Angeles County are at a crossroads. I hope you make the right choices for the benefit of the County and the Department, and I must remind you that it is 2004, not 1964. Just as in Martin Luther King's day, I am confident of the supremacy of a simple idea - all men are created equal.

AV:av

# **ATTACHMENT “D”**

AV010531



From: Williams, Dara [REDACTED]  
Sent: Wednesday, October 12, 2022 5:54 PM  
To: Corbett, Brendan J. [REDACTED]; Chase, Bruce D. [REDACTED] Francisco, Holly A.  
[REDACTED]; OIG/COC Requests [REDACTED]  
Subject: Report Card On Sheriff's Department's Reforms 2019 to 2022 - Validation Draft

This message is from an EXTERNAL SENDER be CAUTIOUS, particularly with links and attachments

Dear Assistant Sheriffs Corbett, Chase, and Francisco,  
Attached is a validation draft of an Office of Inspector General Report Card on Sheriff's Department Reforms – 2019 to 2022. Please review the draft and provide any input or requested changes by the close of business on **October 20, 2022**. As a professional courtesy we have included the Audit and Accountability Bureau in this email.

As always, we find it beneficial if you bring any requested changes or input to our attention prior to October 20<sup>th</sup> in an effort to engage in a dialogue during the time the report is under review by the Sheriff's Department. If we are not aware of any requests or responses by the Sheriff's Department prior to that date, it is unlikely that we will make any adjustments prior to our anticipated report issuance date.

Please do not hesitate to reach out to me if you would like to discuss any portion of the report. The best way to reach me is on my cell phone, which is listed below.

Best regards,

Dara

**Dara Williams (she/her) | Chief Deputy, Inspector General**

Los Angeles County Office of Inspector General  
312 S. Hill Street, 3<sup>rd</sup> Floor, Los Angeles, CA 90013

(T) [REDACTED]

(C) [REDACTED]

(F) [REDACTED]

*Failure of county employees to timely comply with requests for information from the Office of Inspector General is a violation of Government Code section 25303, Los Angeles County Code section 6.44.190 and, under specified circumstances, Penal Code section 13670. Failure to cooperate with an investigation into potential police misconduct may result in revocation of peace officer certification. (Penal Code section 13510.8(b)(6).)*

**CONFIDENTIALITY NOTICE:** This communication with its contents contains confidential and legally privileged information. It is solely for the use of the intended recipient. Unauthorized interception, review, use, or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the intended recipient, please contact the sender and destroy all copies of the communication.

AV010532

**OFFICE OF THE SHERIFF****COUNTY OF LOS ANGELES****HALL OF JUSTICE****ALEX VILLANUEVA, SHERIFF**

October 28, 2021

The Honorable Board of Supervisors  
County of Los Angeles  
383 Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

Dear Supervisors:

**IMMINENT THREAT TO PUBLIC SAFETY**

As the elected Sheriff of Los Angeles County serving over ten million residents and managing an organization of 18,000 employees, I am notifying you of the imminent threat to public safety which will be created by your vaccination mandate and ratified by the Los Angeles County Board of Supervisors (Board) on August 10, 2021. If I were to follow your mandate, I could potentially lose 44 percent of my workforce in one day. I cannot enforce reckless mandates that put the public's safety at risk.

The Los Angeles County Sheriff's Department (Department) has already been "defunded" by over one thousand positions. The Los Angeles County Board of Supervisors is the only board in the entire nation that has continued with last year's defund law enforcement movement. Every other board in the nation has restored funding to their law enforcement agencies. As of this week, homicide rates are up to 44 percent and aggravated assaults are up nearly 23 percent. Despite the substantial loss of personnel, increase in workload, and rise in crime, I have been provided no additional resources by the Board, and you continue to defund my department and freeze my service budget.

For the entire course of this pandemic and prior to any vaccination being available, my employees worked tirelessly to fulfill their commitment to public safety by continuing to answer calls for service, maintaining safe jails, and even assisting to vaccinate our most vulnerable at-risk community members. It is heartbreaking to think that these employees who worked through the pandemic and were called "heroes" are now being threatened with termination because they make a personal medical choice.

**211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012***A Tradition of Service*  
— Since 1850 —

AV010533

The Honorable Board of Supervisors

-2-

October 28, 2021

Compounding this issue is the fact my Department is experiencing a mass exodus of employees who are retiring early. I currently have 1,605 employees that have 28 years of service or more. This means they could retire without financial consequence. This mandate would certainly expedite many of these employees decision to retire.

This Board's mandate will cause patrol services to significantly decline. I would be forced to take drastic measures such as reducing services to the County and contract residents, which would cause the closure and realignment of patrol stations. Specialized units including our Aero and Special Enforcement Bureaus, and Headquarters Detectives would be nearly eliminated.

Of great concern is the upcoming fire season. With the reduction of personnel, I would be unable to mobilize and deploy mobile field forces, which are critical in conducting evacuations during disasters. I have conveyed to other local law enforcement partners I could potentially not have resources to deploy in their time of need due to critical staffing shortages created by this Board's mandate.

There are other alternatives that the Department has incorporated to combat the COVID-19 virus. I have ordered my staff to wear masks. Those that have not been vaccinated must submit to COVID-19 testing. With the pandemic waning, there is no justification for your mandate. This mandate is like putting up storm windows after the storm has passed.

Unlike other County departments that can close their doors and merely cause an inconvenience to the general public, the Department operates 24/7 to protect the public. I cannot afford to cut emergency services or choose not to send a patrol car to assist a community member in need. As the Sheriff, I can firmly tell you this mandate will create a pandemic of chaos within our county resulting in tragic losses.

Should you have any questions or would like to discuss further, please feel free to contact me at [REDACTED].

Sincerely,



ALEX VILLANUEVA  
SHERIFF

AV010534



# EXHIBIT 59



# OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

**HALL OF JUSTICE**

ALEX VILLANUEVA, SHERIFF



October 26, 2022

The Honorable Board of Supervisors  
County of Los Angeles  
383 Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

Dear Supervisors:

**INSPECTOR GENERAL MAX HUNTSMAN ADMITS UNDER OATH HE IS UNABLE  
TO IDENTIFY EVEN ONE "DEPUTY GANG MEMBER"**

On October 25, 2022, Inspector General Max Huntsman, Office of the Inspector General (OIG), appeared and was sworn in under oath for an 8-hour deposition in the matter of, *Art Hernandez, et al. v. County of Los Angeles (Case No. 19STCV33158)*. During which time Mr. Huntsman, contrary to every public statement he has ever made over the last four-years, was unable to identify or name even one person who was a "deputy gang member." Apparently, out of fear of committing perjury, Mr. Huntsman was forced to finally tell mostly the truth about deputy cliques, sub-groups, and fraternal organizations.

Mr. Huntsman was forced to admit on the record that he has no personal knowledge of "deputy gangs," has never witnessed any violations made by "deputy gangs," has no knowledge of any violence committed by "deputy gangs," and has no knowledge of the "Banditos" having a creed, meetings, voting, group structure, or meeting the legal definition of a law enforcement gang, as defined by California Penal Code Section 13670.

He further admitted, other than an anonymous complaint sent on June 19, 2018, he possesses no knowledge or evidence of harassment, retaliation, withholding of backup or battery against personnel, other than the "Kennedy Hall" incident, which the Office of the District Attorney determined to be essentially a drunken brawl, when they declined to file any criminal charges against the involved parties.

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1850 —

The Honorable Board of Supervisors

-2-

October 26, 2022

Mr. Huntsman contradicted the declaration of former Los Angeles County Sheriff's Department (Department) Chief Matthew Burson. He specifically testified under oath, that Mr. Burson's statement in paragraph ten of his declaration, "OIG instructed Internal Criminal Intelligence Bureau to ask questions about the Banditos" was false. Mr. Huntsman stated he does not have the authority to direct Department investigations.

In a Department of approximately 18,000 employees, Mr. Huntsman had no legal option but to admit he could not name even one person belonging to a "deputy gang" and his rhetoric of the last four-years has been based primarily on hearsay, allegations made in lawsuits, and what he learns from the media, not facts.

Under oath, Mr. Huntsman was also forced to finally acknowledge the Department has taken steps to address the issue of deputy cliques, sub-groups, and fraternal organizations, including changing command staff at East Los Angeles Station; implementing a policy prohibiting cliques and sub-groups; issuing a video regarding the cliques and sub-groups policy; transferring certain station personnel to different assignments; having discussions with line personnel; and having discussions with executive personnel.

As indicated to you in my letter dated, February 16, 2022:

I openly challenge every elected leader, or their appointees, to provide facts to me and name individuals who they can prove are "gang members," as defined by California Penal Code section 13670, and subject yourselves to defamation laws if wrong. Using this term as a blanket statement is political cowardice and opportunistic pandering [Exhibit A].

Based on Mr. Huntsman's sworn testimony, I trust this puts to rest any further ridiculous notions suggesting a settlement is warranted in these matters. As you undoubtedly recall, your former County Counsel forwarded a settlement agreement over two years ago on this matter, which I was bypassed on and had I not intervened, would have become a reality. This manner of irresponsible litigation is a waste of taxpayer money and brings harm to the reputation of the Department.

Mr. Huntsman's unhinged obsession to mislead the public into believing he has knowledge of the existence of "deputy gangs," led to a public spectacle, deliberately designed to mislead and misinform the public, as well as influence the outcome of an election, in the form of the Civilian Oversight Commission's (COC) Special Hearings on "Deputy Gangs." The COC has engaged in incredibly unethical behavior during their "kangaroo court," as was noted in my letter dated October 3, 2022, *False and Irresponsible Statements made at COC Special Meeting* [Exhibit B].

The Honorable Board of Supervisors

-3-

October 26, 2022

The facts show this entire “deputy gangs” farce appears to be nothing more than another example of the weaponization of County resources to defund, de-staff, and defame the Department. These “deputy gang” attacks are obviously politically motivated, and as stated in a Los Angeles Times article on March 22, 2022, *Inspector general identifies 41 sheriff's deputies who allegedly belong to gang-like groups*, “The timing of this letter suggests Mr. Huntsman is using his public office and resources to campaign against the sheriff leading up to the June primaries.” Based on his own sworn statements, which highlighted he has absolutely no direct knowledge of any law enforcement gangs, Mr. Huntsman must immediately appear before the COC and admit his past inflammatory and unsubstantiated rhetoric was not factual.

You have continued to turn a blind eye to the abhorrent behavior exhibited by your chosen Inspector General and are complicit in allowing him to damage the reputation of the great men and women who comprise the Department, as well as my own reputation. His inflammatory public rhetoric has damaged public safety, public trust, and has driven a wedge into the heart of the community. Many of his despicable falsehoods, which have been presented time and time again as facts, were cited as a basis for the creation of Measure A.

I demand you order Mr. Huntsman to publicly recant every defamatory statement he has made during the last four-years regarding his false “deputy gang” allegations. Mr. Huntsman has negatively commented about “deputy gangs” and misled the public in countless interviews, articles, media appearances, documentaries, and public meetings. His irresponsible comments have severely injured public perception of the Department and has hurt the reputation of both my personnel and me.

Additionally, I demand you terminate Mr. Huntsman forthwith as a result of the discovery of his most recent unethical behavior, as well as past ethical transgressions [Exhibit C]. Every time I blow the whistle as to his unethical behavior, this Board has ignored me. Why do the words transparency and accountability only seem to apply to others, not this Board or your political appointees?

Lastly, we have definitive evidence that Mr. Huntsman knowingly and intentionally committed perjury during this deposition. I am prepared to share this evidence with you immediately in closed session.



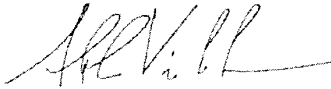
The Honorable Board of Supervisors

-4-

October 26, 2022

Should you have any questions or would like to discuss further, please feel free to contact my Chief of Staff, Commander John Satterfield at [REDACTED]

Sincerely,

A handwritten signature in cursive script, appearing to read 'Alex Villanueva', written in black ink.

ALEX VILLANUEVA  
SHERIFF

The Honorable Board of Supervisors

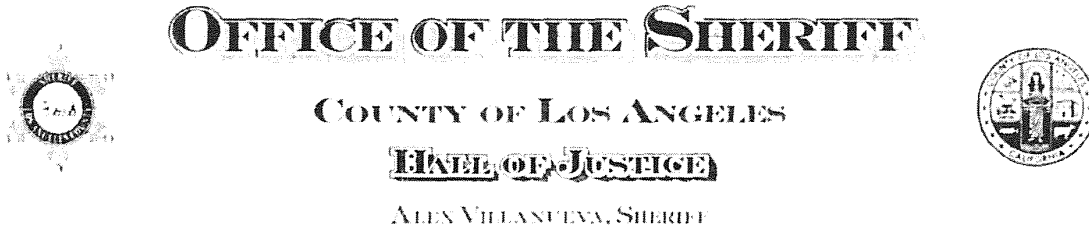
-4-

October 26, 2022

AV:JLS:js:pg

Attachments:      A – Letter to Board – Open Challenge for Elected Leaders  
                             B – Letter to COC - False and Irresponsible Statements  
                             C – Letter to Board – Demand to Relieve Employees of Duty

## **ATTACHMENT A**



February 16, 2022

The Honorable Board of Supervisors  
County of Los Angeles  
383 Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

Dear Supervisors:

**OPEN CHALLENGE FOR ELECTED LEADERS TO IDENTIFY DEPUTY CLIQUE  
MEMBERS WHO YOU CAN SHOW ARE "GANG MEMBERS"**

As the elected Sheriff of Los Angeles County, I demand you and other elected leaders, as well as your appointees, immediately cease and desist from using the derogatory term "deputy gangs" when referring to members of the Los Angeles County Sheriff's Department (Department). This willful defamation of character has injured both individuals and the organization. It also serves no purpose other than to fuel hatred and increase the probability of assault and negative confrontations against our people.

My personnel routinely place themselves in harm's way while serving our community and ask nothing in return, other than a paycheck and maybe a little respect for the tough job they perform. Elected officials have no problem attending the funeral of a peace officer killed in the line of duty and often fight for the opportunity to speak at the podium, but the manner in which some have enthusiastically branded my personnel as "gang members" every opportunity they get is disgusting.

Utilizing the term "gang member" as a reference to members of the Department stems from the false allegations made in a frivolous lawsuit by a now discredited deputy sheriff. The ridiculous claims made by this individual and his attorneys were self-serving, as they increased his chances of receiving a large monetary settlement from Los Angeles County (County), and both the discredited plaintiff and his attorneys were sanctioned monetarily for their failure to comply with orders of the Court.

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1850 —

SCANNED TO BOS LIAISON TEAM  
2/16/22

The Honorable Board of Supervisors

-2-

February 16, 2022

The false and unproven allegations in this case alleging "deputy gangs" was used as the primary basis for attacks on the Department by some members of the Board of Supervisors<sup>1</sup> (Board), a former member of the Board (who has been federally indicted for 20 counts of public corruption), the Office of the Inspector General, the Civilian Oversight Commission, other elected officials, and the media. Their statements have been presented as "facts" in reports by RAND, the Center for Juvenile Law & Policy, and Knock LA. The Los Angeles Times alone has referenced these unsubstantiated allegations in at least a dozen articles. These writings have served to attack and undermine the perceived credibility and legitimacy of our organization, even though they were based on what we now know to be a highly incredible source.

On November 4, 2021, the case in question was dismissed due to *"lack of evidence and absence of triable facts."* The Court also highlighted the complainant *"may not contradict his deposition testimony by proffering different testimony in a later declaration."*

On January 14, 2022, the Court additionally stated this case *"was brought for reasons other than to remedy personal harm to the plaintiff. To further their mission, plaintiff and his attorneys came up with a series of unproven allegations, including claims about ... unusual misdemeanor arrests, illegal quota programs and actions involving other deputies."*

As a sponsor of Assembly Bill 958, it is important for me to point out the specific term "deputy gangs" is not covered in California Penal Code Section 13670. The term also serves to line the pockets of attorneys who have created a "cottage industry" using the media attention gained through these attacks on the Department. At least one frivolous lawsuit actually quoted comments made on the record by the Board regarding "deputy gangs" in their pleading.<sup>2</sup>

Those who want to further undermine the perception of law enforcement use it as hate speech to promote their own agendas, such as defunding law enforcement and redirecting those funds to their own non-profit organizations, many of which are nothing more than sham corporations who operate with virtually zero accountability. Further use of the term will be evidence of your actual underlying intent, which appears to be a campaign to inflict harm upon the reputation of the Department and myself.

---

<sup>1</sup> Motion by Supervisors Sheila Kuehl and Hilda L. Solis, *Assessing County Liability in Settlements Involving Sheriff "Gangs"* (April 30, 2019), available at: <http://file.lacounty.gov/SDSInter/bos/supdocs/136078.pdf>.

<sup>2</sup> Civil Rights Complaint <https://song-dash.digitalfirstmedia.com/wp-content/uploads/2020/08/Montano-Complaint-FILED.pdf>

The Honorable Board of Supervisors

-3-

February 16, 2022

As the first fluently Spanish speaking Latino Sheriff in over a hundred years, who supervises a majority Latino workforce, I hope you can see the blatant racial inferences your conscious bias displays every time you choose to attack our Department with this derogatory term.

It is extremely disheartening that this Board refused to acknowledge or take any corrective action when brought to your attention on November 17, 2021, in regard to the defamatory and slanderous statements from your appointee to the Civilian Oversight Commission, Chair Priscilla Ocen, for the following statements, *"We have a problem with white supremacy in the L.A. County Sheriff's Department. We have a problem with white supremacist gangs. We already knew that LASD has a culture of impunity. They lie, they cover up gangs and murders. LASD as a whole is operating as a gang."*

Similar to the lack of action with Commissioner Ocen's remarks, and very hypocritically, the silence from this Board was deafening when you chose to ignore the shockingly irresponsible and racially charged comments made by Supervisor Holly Mitchell during an online forum advertised as, *Exposing L.A. Sheriffs Gangs, Murders, & Harassment of Families*,<sup>3</sup> on March 27, 2021. During this *Black Lives Matter - Los Angeles* sponsored forum (Attachment A), Supervisor Mitchell stated, among other things, *"Law enforcement, the district attorney's associations, and sheriff's associations of California... are clearly such white supremacist organizations."* These types of biased blanket statements by politicians make the day-to-day challenges peace officers face even more difficult and serve to undermine our ability to safely de-escalate dangerous situations in the field. Even though this Board has chosen to ignore her behavior, we continue to believe Supervisor Mitchell owes a heartfelt apology for her grossly irresponsible and racially charged defamation of our Department, which in fact contains all races, ethnicities, sexes, religions, and sexual identities.

At this same online anti-law enforcement forum, Supervisor Hilda Solis also appeared as a guest and spoke on the topic of "deputy gangs." During which she stated the Department has engaged in *"decades of historical discrimination and racism."* Then went on to say, *"The Sheriff's Department is a very violent organization, we know in many ways, retaliation and harassment."*

Interestingly, this *Exposing L.A. Sheriffs Gangs, Murders, & Harassment of Families* event was also recognized by another guest and speaker, Valarie Vargas, as additionally being sponsored by *Check the Sheriff*. The same organization which submitted a letter to the Board on February 7, 2022, requesting to *"create a procedure to allow impeachment and removal of the sheriff."* They stated their main reason for this was due to "deputy gangs." Not only have your words encouraged much of the

---

<sup>3</sup> Facebook "Exposing L.A. Sheriffs Gangs, Murders, & Harassment of Families"  
<https://www.facebook.com/blmla/videos/stop-la-sheriff-attacks-family-forum/347471413336304/>

The Honorable Board of Supervisors

-4-

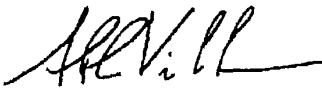
February 16, 2022

disinformation, but two Board members have actively participated in these activists' political events.

I openly challenge every elected leader, or their appointees, to provide facts to me and name individuals who they can prove are "gang members," as defined by California Penal Code Section 13670, and subject yourself to defamation laws if wrong. Using this term as a blanket statement is political cowardice and opportunistic pandering.

Should you have any questions or would like to discuss further, please feel free to contact me at [REDACTED]

Sincerely,

A handwritten signature in black ink, appearing to read 'Alex Villanueva', with a stylized flourish at the end.

ALEX VILLANUEVA  
SHERIFF

The Honorable Board of Supervisors

-5-

February 16, 2022

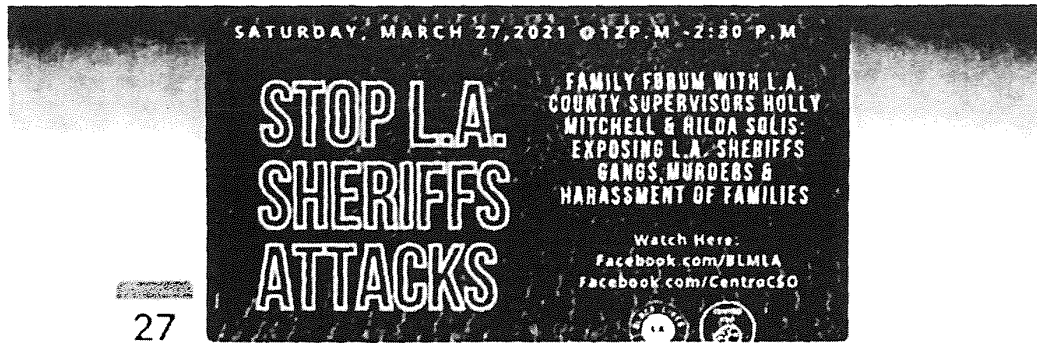
AV:JLS:ac  
(Office of the Sheriff)

c: Brian K. Williams, Executive Director, Sheriff Civilian Oversight Commission  
Tab Rhodes, Professional Peace Officers Association  
James Wheeler, President, Association for Los Angeles Deputy Sheriffs  
Cesar Romero, President, Los Angeles Sheriff's Professional Association



ATTACHMENT - A

OPEN CHALLENGE OF ELECTED LEADERS TO IDENTIFY DEPUTY CLIQUE MEMBERS  
WHO YOU CAN SHOW ARE "GANG MEMBERS"



in case of 8:00 PM PST

Stop LA Sheriff's Attacks Forum Mar 27 @12 PM

The Live Video Event Started

Interested

Going

Invite



Details

Hosts

BLMLA



BLMLA

CentraCSO

Message



BLMLA is a community of people who are passionate about stopping the attacks on the families of law enforcement officers.

**Calderon, Angie M.**

---

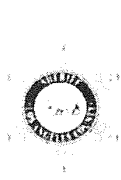
**From:** Wright, Adam R.  
**Sent:** Wednesday, February 16, 2022 4:03 PM  
**To:** hsolis1@bos.lacounty.gov; hollyjmitchell@bos.lacounty.gov; SKuehl@bos.lacounty.gov; jkhahn@bos.lacounty.gov; KBarger@bos.lacounty.gov  
**Cc:** BOS Liaison Team; Chen, Cindy; FMcGee@bos.lacounty.gov; Mande, Lisa; gpinedo@bos.lacounty.gov; Mouradian, Anna  
**Subject:** Sheriff, Identification of Department Personnel  
**Attachments:** Scanned from a Xerox Multifunction Device.pdf

Good Afternoon,  
Please see attached letter from Sheriff Villanueva.

Respectfully,

**Sergeant Adam Wright**  
Liaison to the Board of Supervisors  
Los Angeles County Sheriff's Department  
211 West Temple Street  
Los Angeles, CA 90012  


## **ATTACHMENT B**



# OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

**DEPT. OF JUSTICE**

ALEX VILLANUEVA, SHERIFF



October 3, 2022

Brian K. Williams, Executive Director  
County of Los Angeles  
Civilian Oversight Commission  
350 South Figueroa Street, Suite 288  
Los Angeles, California 90071

Dear Mr. Williams:

## **FALSE AND IRRESPONSIBLE ALLEGATIONS MADE AT CIVILIAN OVERSIGHT COMMISSION SPECIAL MEETING**

On September 23, 2022, the Civilian Oversight Commission (COC) conducted another special hearing on "deputy gangs." During the hearing, Attorney Bert Deixler introduced information he stated was relayed to him by Captain Angela Walton. Attorney Deixler publicly stated as fact, an unknown dark colored Nissan sedan had been parked on the street directly across from Captain Walton's residence on September 20, 2022, the day she appeared in front of the COC.

Attorney Deixler went on to state Captain Walton recognized the vehicle as an "*undercover sheriff's vehicle*." Attorney Deixler then publicly displayed two images. The first image depicted the driver's side profile of a dark colored sedan. The second image depicted the rear tailgate of a Scion XB with the California license plate displayed.

Attorney Deixler stated Captain Walton told him, "... *she would not be intimidated*." A statement which denoted Los Angeles County Sheriff's Department (Department) personnel were actively surveilling her because she had testified in front of the Civilian Oversight Commission. This accusatory sentiment was later picked up by the news and on social media.

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1850 —

Mr. Williams

-2

October 3, 2022

The Department initiated an inquiry soon after these allegations were made. The inquiry has concluded, and the findings revealed the vehicle Captain Walton suspected of being involved in surveillance of her, absolutely does not belong to the Department, absolutely was not connected to the Department in any way and was in the vicinity for reasons which absolutely were unrelated to Captain Walton in any way.

The manner in which the Department was portrayed by Attorney Deixler to the COC and public was irresponsible and unethical. A simple vetting of the information through ANY law enforcement entity could have brought forth the same results as we have provided to you. All parties involved were aware of the fact a public forum was not the venue to make those statements until they could be confirmed or disproven. Although, it is highly likely these irresponsible statements were intentionally made, in line with the COC's demonstrated mission of attacking the Department. By introducing "gossip" during your meetings and offering it to the public as reliable information, you show your commission to be unprofessional, unreliable, and desperate disciples of confirmation bias.

Additionally, there was no "full disclosure" of the fact Captain Walton, and her attorney Vincent Miller, stand to significantly gain monetarily by continued portrayal of the Department in a negative light. If the COC is now a tool for civil attorneys with multiple lawsuits against the Department to strengthen their cases, please disclose this fact. If not, then stop acting like you are. I demand the COC issues a public statement correcting the record on every one of your social media platforms.

Should you have any questions or would like to discuss further, please feel free to contact my Chief of Staff, Commander John Satterfield at [REDACTED]

Sincerely,

ALEX VILLANUEVA  
SHERIFF

## **ATTACHMENT C**



# OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ALEX VILLANUEVA, SHERIFF



October 5, 2022

The Honorable Board of Supervisors  
County of Los Angeles  
383 Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

Dear Supervisors:

## **DEMAND TO RELIEVE SPECIFIED CONFIDENTIAL EMPLOYEES FROM THEIR DUTIES OF PUBLIC TRUST**

Shortly after I was sworn into office on December 3, 2018, my staff alerted me to a series of illegal personnel file downloads that were launched by members of the Office of Inspector General and Constitutional Policing Advisors from the administration of Sheriff Jim McDonnell. This data breach appeared to have been initiated immediately following the primary election that was held in June 2018 and does not appear to have been done for a lawful reason. Former Sheriff McDonnell's staff had launched an inquiry into the matter, only to abandon it without proper resolution.

In early 2019, we initiated a criminal inquiry into the matter and consulted with representatives from the state Attorney General's office and the Federal Bureau of Investigation (FBI). Inspector General Max Huntsman's protestations were centered on his claims that he had permission from the incumbent to view my confidential personnel files. Our investigation indicates no such permission existed, either in writing or supported by the former sheriff, who refused to answer questions from our investigators. The investigation was turned over to the Attorney General's office in September 2021 for a prosecutorial decision. Please note this investigation names five suspects of criminal conspiracy to commit burglary and illegal removal of personnel files, among other charges.

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1950 —

The Honorable Board of Supervisors

-2-

October 5, 2022

We have previously written to your office regarding the liability of permitting named felony suspects to continue working in their official capacity during the pendency of the criminal investigation. Now we have a whole new set of issues based on the extraordinary admissions from Supervisor Sheila Kuehl during the execution of search warrants by deputies assigned to our Public Corruption Unit. On live local television, Supervisor Kuehl claimed to have been alerted to the search warrants in advance by Acting County Counsel Dawyn Harrison, with information she received from Inspector General Max Huntsman. On September 21, 2022, I wrote to you listing the reasons why Mr. Huntsman needed to be relieved of his duties [Attachment A], and I have yet to receive a response.

In addition to Supervisor Kuehl's own public statements, court documents [Attachment B] reveal the names of two other individuals who alerted Supervisor Kuehl of the service of the warrant, in an apparent conspiracy to obstruct justice: Lisa Mandel, Chief of Staff, District 3, and Torie Osborn, Senior Strategist, District 3. As appointed officials who are considered confidential employees and trusted to maintain confidentiality over internal records and law enforcement operations, the alleged conduct of the four individuals referenced herein, and others who during the course of the Attorney General's investigation may also be identified, can no longer have access to Los Angeles County Sheriff's Department (Department) records, operations, or be involved in decision-making regarding oversight and/or legal representation.

Consistent with standard Department policy, Mr. Huntsman will be removed from all access to Department facilities, personnel, and databases effective immediately. This standard is applied to all Department personnel who are named as a suspect in a criminal case involving felony crimes. The list of potential charges Supervisor Kuehl and Commissioner Patricia Giggans include the following:

- California Government Code 1090, Conflict of Interest
- California Penal Code 165, Bribery of a public official or member of a board of supervisors
- California Penal Code 182.5, Conspiracy to obstruct justice
- California Penal Code 182, Conspiracy to commit any crime
- California Penal Code 503, Embezzlement
- California Penal Code 424, Theft, or misappropriation of public funds

The list of potential charges facing Mr. Huntsman, Ms. Harrison, Ms. Mandel, and Ms. Osborn include the following:



The Honorable Board of Supervisors

-3-

October 5, 2022

- California Penal Code 182, Conspiracy to commit any crime
- California Penal Code 182.5, Conspiracy to obstruct justice
- California Penal Code 31, Aiding and abetting a crime
- California Penal Code 135, Destruction of evidence

There is no alternate universe where county counsel can dictate the manner in which the Department is represented in court, while they are actively involved in allegedly concealing criminal activity and obstructing the investigative function of the sheriff [California Government Code 25303]. To the contrary of taking corrective action, both Supervisor Kuehl and Supervisor Hilda Solis have made public statements on social media condemning both myself and the Department for the execution of a lawful public corruption search warrant that was properly vetted, approved by a judge, and reaffirmed by a second judge. Acting County Counsel Harrison is in no position to deny compensating the attorney of our choosing, who won for us in court, based on these extraordinary set of events [Attachment C]. Her apparent motive in denying counsel was to see the search warrant overturned by the court for lack of proper counsel. It is your moral and legal obligation to pick up the costs for *Werksman Jackson & Quinn LLP*. Please refer to Ms. Harrison's own words:

*"... I wanted to remind you that only the Office of County Counsel, or the law firms we retain, may represent you, in your official capacity, and the LASD... Therefore, you have no authority to retain your own counsel to represent either you or the LASD, nor is the County of Los Angeles responsible for any of the costs incurred by those law firms. I recently discovered that you improperly retained Werksman Jackson & Quinn LLP in this matter. I will notify them that they have no authority to represent you or LASD and will not be paid by the County of Los Angeles, and I will copy the Attorney General's Office."*

It is not the first time we have informed you of unethical and/or incompetent representation by county counsel and contract counsel that have had negative consequences to the Department. From failing to adequately present a defense in a high-profile civil lawsuit, failing to aggressively challenge false assertions in employee lawsuits, to colluding with the Civilian Oversight Commission and the Inspector General's office to give the false impression we are not complying with the submission of subpoenaed information or testimony. It is clear you have weaponized legal representation of the Department as another avenue to discredit my administration for your political interests. This comes at great expense to the taxpayer and to our credibility, which seems to be your goal.

The Honorable Board of Supervisors

-4-

October 5, 2022

To be clear, the investigation is real, my authority is real, and so is that of the Attorney General who has now assumed responsibility for the investigation, which was initiated at our request. The investigation itself regarding *Peace Over Violence* was initiated based on a criminal complaint from a whistleblower, and contrary to false assertions by those involved, we do not investigate people, only allegations of criminal activity. This is true of every investigation initiated by the Department, including those by the Public Corruption Unit.

In closing, as a matter of reference, I wrote a whistleblower memorandum back in December of 2004 regarding the unfolding corrupt actions of then Division Chief Paul Tanaka [Attachment D]. As a young sergeant, I laid out publicly in detail my concerns regarding the unethical conduct and behavior of the administration of then Sheriff Lee Baca. I was laughed at, ridiculed, attacked, and had my career derailed for over a decade. The Board of Supervisors were informed of Baca and Tanaka's corruption, as were members of the Office of Independent Review, but it wasn't until the Citizen's Commission on Jail Violence and the FBI intervened, when the corruption began to halt. Needless to say, I stood my ground and was ultimately vindicated.

Today and again, I am standing my ground. You have two choices: circle the wagons and protect corruption or come clean and stand up for doing the right thing. Choose wisely, history will be your judge.

Should you have any questions or would like to discuss further, please feel free to contact my Chief of Staff, Commander John Satterfield at [REDACTED]

Sincerely,

A handwritten signature in black ink, appearing to read 'Alex Villanueva', with a long horizontal line extending from the end of the signature.

ALEX VILLANUEVA  
SHERIFF

The Honorable Board of Supervisors

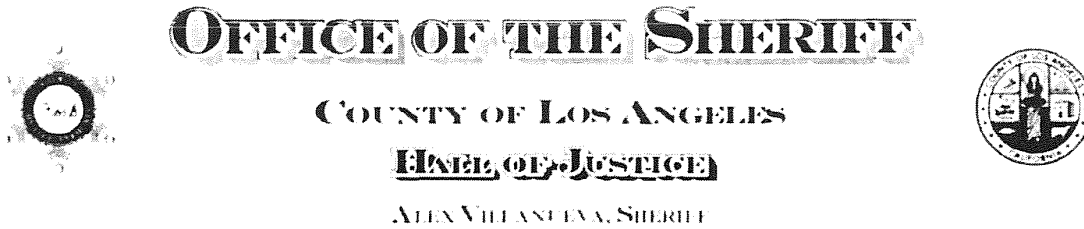
-5-

October 5, 2022

AV:JLS:js

Attachments:      A – Letter for Removal of Max Huntsman  
                            B – Court Documents (Declaration)  
                            C – County Counsel Correspondence  
                            D – Letter to LASD Executives (2004)

# **ATTACHMENT A**



September 21, 2022

The Honorable Board of Supervisors  
County of Los Angeles  
383 Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

Dear Supervisors:

**REQUEST FOR REMOVAL OF MAX HUNTSMAN AS INSPECTOR GENERAL  
RESULTING FROM ALLEGATIONS OF CONSPIRACY TO COMMIT  
OBSTRUCTION IN SEARCH WARRANT**

On February 18, 2021, in a six-page letter, I informed you of my "grave concerns with the conduct of your appointed Inspector General Max Huntsman." I pointed out his "zealot-like behavior which continues to create civil liability for the Los Angeles County." I stated his "intellectual dishonesty places the public at an increased risk." The letter ended with "I ask the Board to consider my concerns and replace the IG with one who is accredited, unbiased, and capable of maintaining a professional working relationship."

As you were also aware at the time, Mr. Huntsman was a felony suspect in a theft of electronic information investigation, which remains an active investigation at the Office of the Attorney General. You had an opportunity to relieve Mr. Huntsman of his duties then, but declined, and the Board ignored my request. Unfortunately, your failure to address the issues I pointed out to you in 2021 has now resulted in an even more serious crime allegedly occurring, which is additionally under active investigation by the Office of the Attorney General.

On September 14, 2022, as you are likely aware, public corruption search warrants were served at multiple locations. During the service at Supervisor Shelia Kuehl's residence, she stated to reporters, "I heard from County Counsel last night that she got a tip from Max Huntsman that the search would happen this morning." In the event you have not heard the statement for yourself, it was aired by every local news channel, and it is posted on all Los Angeles County Sheriff's Department's social media accounts.

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1850 —

The Honorable Board of Supervisors

-2-

September 21, 2022

Moreover, based on Supervisor Kuehl's statements and Attorney General Rob Bonta's announcement, Mr. Huntsman and the Los Angeles County Counsel have now become the focus of a criminal investigation by the Office of the Attorney General, and as such, the conflict of interest in Mr. Huntsman remaining in his current assignment is untenable. For these reasons, I demand that Mr. Huntsman be treated like any other of the over 100,000 Los Angeles County employees and be relieved of his duties, pending the outcome of the Attorney General's criminal investigation.

Given the above, it is the established pattern and practice everywhere in the Los Angeles County, by every department, that an employee is to be relieved of duty and/or reassigned upon reliable knowledge of alleged criminal activity, and an investigation is pending which could lead to termination.

Should you have any questions or would like to discuss further, please feel free to contact my Chief of Staff, John L. Satterfield, at [REDACTED]

Sincerely,



ALEX VILLANUEVA  
SHERIFF

**ROB BONTA**  
*Attorney General*

*State of California*  
**DEPARTMENT OF JUSTICE**



1300 I Street  
P.O. Box 944266  
Sacramento, CA 95834-2591  
Telephone: 916-220-6009  
E-Mail Address: Lance.Winters@doj.ca.gov

January 25, 2022

Timothy K. Murakami  
Undersheriff  
Office of the Sheriff  
County of Los Angeles  
Hall of Justice  
211 West Temple Street  
Los Angeles, CA 90012

VIA EMAIL AND U.S. MAIL

Re: Possible criminal conduct

Dear Undersheriff Murakami:

The Department of Justice (DOJ) is in receipt of your letters regarding possible criminal conduct. Specifically, we have received: (1) letters dated July 23, 2020, and October 20, 2021, regarding possible criminal conduct by Sachi Hamai; and (2) a letter dated November 16, 2021, regarding possible criminal conduct by five individuals who purportedly engaged in acts to "unlawfully obtain and distribute confidential, protected personnel records."

As to the former matter, you request that DOJ "conduct the criminal inquiry"; as to the latter, you implicitly request that DOJ conduct any necessary inquiry and review the matter, noting "the inherent conflict(s)" for further inquiry and asking that, should we decline "further inquiry or review," to refer the matter to a district attorney's office outside of Los Angeles County. DOJ will review these matters.

Additionally, it has come to our attention that your Office has been involved in a criminal investigation of Peace Over Violence and/or Executive Director Patti (Patricia) Giggans. Specifically, it has been reported that, in February and March 2021, your Office executed search warrants at the offices of Peace Over Violence and L.A. Metro as part of a criminal investigation. (E.g., Jason Henry, *LA County Sheriff Investigating Oversight Commissioner's Nonprofit, Search Warrants Show*, L.A. Daily News, June 18, 2021.)

January 25, 2022

Page 2

DOJ requests that your Office to provide a report on the status of the investigation of Peace Over Violence and/or Executive Director Parti (Patricia) Giggans. (Cal. Const., art V, § 13 (noting Attorney General has supervisory authority over sheriff and may require "reports concerning the investigation, detection, prosecution, and punishment of crime").) Your cooperation in this request is appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Lance Winters", with a stylized flourish at the end.

Lance Winters  
Chief Assistant Attorney General

For ROB BONTA  
Attorney General





# OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ALEX VILLANUEVA, SHERIFF



204  
BOS Liaison

February 18, 2021

The Honorable Board of Supervisors  
County of Los Angeles  
383 Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

Dear Supervisors:

## THE NEED FOR AN HONEST AND OBJECTIVE INSPECTOR GENERAL

The purpose of this communication is to advise you of my grave concerns with the conduct of your appointed Inspector General (IG), Max-Gustaf Huntsman, and the publications authored by his office which directly influence the unsuspecting public's perceptions regarding both the credibility of the Los Angeles County Sheriff's Department (Department) and the legitimacy of our operations. His zealot-like behavior continues to create civil liability for the County and potentially endangers the life of deputies in the field, as he artificially stokes animosity between the Department and the community.

In addition to potentially endangering the lives of our deputies, his intellectual dishonesty places the public at an increased risk. After utilizing good communication and de-escalation strategies, deputies can only ultimately perform the detention or arrest of an individual one of two ways: 1) The person voluntarily submits to lawful authority; or, 2) The person resists and the deputy uses force to overcome their resistance and gain safe control. As the public continues to be misled by Mr. Huntsman as to the Department being engaged in widespread "unlawful conduct," they are far less likely to voluntarily comply. Statistically, this in and of itself places members of the public in situations that are far less likely to have a peaceful resolution.

The expectation of the public regarding the conduct of an IG is they are dedicated to serving the public's interest by working tirelessly to fairly assess the operations of any given organization and provide meaningful input for reforms, which may be required to adapt to an ever-changing world. Indeed, the National Association of Inspectors General posits this public expectation is best served when:

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1850 —

SCANNED & E-MAILED TO BOS LIAISON  
TEAM 2/18/21

The Honorable Board of Supervisors

-2-

February 18, 2021

This public expectation is best served by inspectors general when they follow the basic principles of integrity, objectivity, independence, confidentiality, professionalism, competence, courage, trust, honesty, fairness, forthrightness, public accountability, and respect for others and themselves (AIG Principles and Standards, pg. 3, 2014).

Please note the first two principles outlined above, integrity and objectivity. I will provide you a brief rundown of the fundamental defects of Mr. Huntsman's work product, starting with the most recent publications and working our way back towards the start of my administration.

The Office of Inspector General (OIG) report "Review and Analysis of Misconduct Investigations and Disciplinary Process" released in February 2021 suffers from multiple fatal defects, chief among them the fallacy of a study period (2015-2019) which encompasses two administrations without distinguishing and contrasting the data from both. Another fatal flaw is the use of individual cases in an anecdotal fashion as representative of the entire Department's operation without providing proper context with the totality of cases investigated and discipline rendered. A select quote from the introduction:

Notwithstanding the current Sheriff's assertions, we were not provided by the Sheriff, and in our review, we did not observe or find, any evidence of falsification of evidence or reports which resulted in the wrongful discipline of a department employee (pg. 4, 2021).

This statement is demonstrably false and illustrative of the nature of the report itself. The Department conducted an in-depth analysis of the Mandoyan case, which is now a public document, wherein it was proven that a key exculpatory witness was identified, interviewed, and the results concealed from both the Civil Service Commission and the employee fighting the discharge (see the Department's Case Analysis, October 1, 2019).

The next production from the OIG, "Report Back on Unlawful Conduct of the Los Angeles County Sheriff's Department" was a letter dated December 14, 2020, addressed to the Civilian Oversight Commission (COC), purportedly in response to a request from Commissioner Priscilla Ocen. The starkly sophomoric report amounted to nothing more than a rehash of current and past litigation and a torturous defense of the legal fallout from Mr. Huntsman's oversteps in a homicide investigation.

This report was designed exclusively as a political tool to discredit the Department and does not appear to have any legitimate purpose in oversight, transparency, or accountability. Perhaps the most startling false statement is the section subtitled

The Honorable Board of Supervisors

-3-

February 18, 2021

Failure to Investigate and Prohibit Deputy Secret Societies (pg. 12). Mr. Huntsman has the Department's criminal and administrative investigations of the Kennedy Hall incident from former Sheriff Jimi McDonnell's tenure, and he is aware that 26 employees were disciplined, including four who were terminated as a result of that administrative investigation. Mr. Huntsman is also aware of the Department's new policy regarding forming or participating in deputy subgroups, which was issued in February 2020 and is being vigorously enforced.

The preceding report "The Right to Know Act: Los Angeles County Sheriff's Department Response to Police Transparency Reform" was published in November 2020, and in typical OIG fashion, deliberately used outdated information from January 2020 to make the false claim the Department was not complying with SB 1421. For the record, as of December 31, 2020, the Department achieved full compliance with SB 1421 with a 96.45 percent rate, a number Mr. Huntsman was well aware was in the making and far different than the 70 percent non-compliance rate he reported just a month earlier.

Mr. Huntsman is also aware of the issues the Department has had since the inception of SB 1421, with antiquated databases that do not communicate with each other and the severe lack of staffing to meet the new requirements (a failure of leadership by the previous administration). To wit, in a letter dated July 6, 2020, to former Board of Supervisors (BOS) Chair, Supervisor Kathryn Barger, the Department outlined six different occasions where we requested additional resources through the Chief Executive Office and were denied repeatedly. It was only through cannibalizing different functions of the Department that we were able to muster enough personnel to satisfy SB 1421 and California Privacy Rights Act requests. Comparing our operation to Los Angeles Police Department's is a dishonest comparison based on disparate funding levels, IT infrastructure, and staffing levels.

Looking through the sheer number of reports authored by the OIG, a persistent pattern emerges wherein the OIG ignores Department investigations, results of investigations, and actions taken in response to complaints from the public. The November 17, 2020 report back to the COC regarding the alleged harassment of family members after fatal deputy-involved shootings is one example of this. The report negates in its entirety the concerns of the public over impromptu memorials and gang members loitering in the vicinities of their homes, concerns which were addressed properly by the Department's report.

Examining the OIG's report's table of contents alone since its inception reveals a deferential OIG during former Sheriff McDonnell's administration, with report titles of a generic and non-inflammatory nature, unlike those published during my administration.

The Honorable Board of Supervisors

4

February 19, 2021

As a matter of fact, the OIG generated as many reports during my first two years in office as they did during all of former Sheriff McDonnell's tenure, and that includes the conspicuously "confidential" report Mr. Huntsman prepared to bury the potentially illegal actions of former Sheriff McDonnell's Assistant Sheriff, Mike Rothman, for his purchase of a stolen vehicle from a contracted tow company.

Without question, these reports would be rejected by any legitimate academic institution. They are filled with unproven allegations, anecdotal data, omissions, distortions, and an overall permeation of bias and intellectual dishonesty. They are truly not the level of accuracy and authenticity expected in County government. Furthermore, if my own deputies consistently authored documents at this level, they would at the very least be placed on a performance improvement plan, and in cases of deception, omission, and lack of honesty, an administrative investigation would be conducted. I believe the responsibility for performance and accountability issues with Mr. Huntsman belongs, in part, to the OIG. Yet, they seem too hyper-focused on political activism and calls for my own resignation to focus on this duty.

Since taking office in December 2018, I have continued my reforms within the Department to enhance public safety and strengthen the ties within our communities. As the elected Sheriff serving the most populous county in the nation and employing nearly 18,000 employees, this is no easy task. Having inherited significant problems from past administrations, I remain committed to effecting positive change for the residents of Los Angeles County.

As the first progressive democratic sheriff, I have delivered on many of my campaign promises to bring reform and transparency to the Department. I have instituted major reforms regarding Immigration and Customs Enforcement (ICE), leadership diversity, wage theft, and the single most important commitment to transparency - body worn cameras. Although Mr. Huntsman authored multiple reports on the Department's cooperation with ICE, he became silent in light of the moratorium on all inmate transfers to ICE custody. Again, this amounts to false documentation by omission and does not serve to inform either the public or the Department.

As a result of these unethical reports, the Department is suffering irreparable damage and our standing in the community is being undermined by continual misleading and false attacks. It should be of great concern to all of us that his actions are eroding public trust and creating a liability for the Department. His hopelessly biased reporting will only invite future frivolous lawsuits which the hardworking taxpayers will have to waste money defending, while at the same time artificially rising tensions in the community which can endanger the lives of our deputies. This was clearly evidenced by the brutal attack on our two Compton Transit Services Bureau deputies which horrified the entire nation.

The Honorable Board of Supervisors

-5-

February 18, 2021

The IG serves an advisory role, just like the COC. When their efforts are driven by political agendas and not facts, they fail to serve the public's expectations of oversight and betray the reason for their existence. As a result, their work product does not inform the Department's operations and will not be considered of any value. The Department will continue, however, to provide both entities all the information they are legally entitled to receive.

As you have been advised in writing, the Department continues to investigate a data breach discovered at the beginning of 2019. The Legislature has enacted a statutory scheme defining the powers and duties of a sheriff (Government Code Sections 26600-26778). Section 26600 generally provides:

The sheriff shall preserve peace, and to accomplish this object may sponsor, supervise, or participate in any project of crime prevention, rehabilitation of persons previously convicted of a crime, or the suppression of delinquency.

A sheriff is also expressly authorized and directed to investigate public offenses that have been committed and to arrest and take before a magistrate all persons who have committed a public offense (Sections 26601-26602). There is no statutory scheme that places anyone, including members of the OIG, above the law. As such, it is with concern that I read a letter from Lawrence Middleton to County Counsel, who had retained him to purportedly provide legal guidance on this very issue. In his words:

Upon completing my analysis, I wanted to bring to Undersheriff Murakami's attention a number of issues and concerns that cause me to counsel against a continuation or escalation of the investigation. Most notably, as detailed below, because none of the potential charges being investigated are likely to lead to a successful criminal prosecution, Department personnel involved in the investigation could place themselves in jeopardy or criminal prosecution and/or civil liability if they continue (March 6, 2020).

This letter appears to be an attempt to intimidate, coerce, or otherwise dissuade the Department from carrying out our lawful duty and is unacceptable. It should be noted neither County Counsel nor Mr. Middleton has knowledge of the scope or details of the investigation, rendering such opinions ill-informed and ill-advised. I have recused myself from this inquiry and know of its details superficially.

The Department needs an IG who is not ethically compromised and is certified by the National Association of Inspectors General. I expect the work product of the OIG to adhere to professional standards as cited in the Association of Inspectors General's book, "Principles and Standards for Offices of Inspector General," also known as the Green Book. The public, the Department, and BOS all deserve accurate reporting

The Honorable Board of Supervisors

-6-

February 18, 2021

which is not politically motivated. I ask the BOS to consider my concerns and replace the IG with one who is accredited, unbiased, and capable of maintaining a professional working relationship. The Department's reputation is being unfairly tarnished by the IG in his personal attacks towards us. We need an IG who is fair and objective, not inflammatory and controversial.

The Department is a national trendsetter on many important issues, such as the relationship between local law enforcement and federal immigration enforcement, combatting the spread of COVID-19 in congregate living facilities and super spreader events, the Wage Theft Task Force, defending the community during periods of civil unrest, and transparency. Our efforts are often adopted as best practices by other law enforcement agencies throughout the nation. Our reputation is at stake. The IG's personal vendetta should not come at the expense of our dedicated employees who put their lives on the line each and every day in service to the community.

Should you have any questions or would like to discuss further, please feel free to contact me at [REDACTED]

Sincerely,

ALEX VILLANUEVA  
SHERIFF

The Honorable Board of Supervisors

-7-

February 18, 2021

AV:JAV:ac  
(Office of the Sheriff)

c: Rodrigo A. Castro-Silva, County Counsel, Office of the County Counsel

# **ATTACHMENT B**



1 WERKSMAN JACKSON & QUINN LLP  
2 ALAN J. JACKSON (Bar No. 173647)  
3 CALEB E. MASON (Bar No. 246653)

4 888 W. 6<sup>th</sup> St. 4<sup>th</sup> Floor  
5 Los Angeles, California 90017

6 Attorneys for Los Angeles County Sheriff's Department

CONFIRMED COPY  
ORIGINAL FILED  
Superior Court of California  
County of Los Angeles

SEP 22 2022

Sherril R. Carter, Executive Officer/Clerk of Court  
By: Sheryl R. Humber, Deputy

7  
8 SUPERIOR COURT OF CALIFORNIA  
9 COUNTY OF LOS ANGELES – CENTRAL DISTRICT

10 IN RE: SEARCH WARRANT SERVED  
11 ON OFFICE OF THE INSPECTOR  
12 GENERAL FOR THE LOS ANGELES  
13 COUNTY METROPOLITAN  
14 TRANSPORTATION AUTHORITY ON  
15 SEPTEMBER 14, 2022

Case No.: Misc. BH014167

(Hon. William C. Ryan – Department  
56W)

DECLARATION OF MAX O.  
FERNANDEZ IN RESPONSE TO  
COURT'S ORDER DATED  
SEPTEMBER 20, 2022.

Date: September 22, 2022  
Time: 1:30 p.m.  
Dept.: 56W

16  
17  
18  
19 DECLARATION OF SGT. MAX O. FERNANDEZ

20 I, Max O. Fernandez, declare as follows:

21 I. I am employed as a sergeant for the Los Angeles County Sheriff's  
22 Department ("LASD"). I am assigned as the lead investigator in the Department's  
23 investigation of related to possible criminal conduct regarding the awarding of contracts  
24 to Peace Over Violence (POV) by the Metropolitan Transportation Authority (MTA)  
25 ("the Matter"). I am the affiant for the search warrants relating to the Matter. There are  
26 two: one signed on February 26, 2021, by Judge Ronald Coen. I am also the Affiant for  
27 the Search Warrant which was signed on September 8, 2022 by Judge Craig Richman. I  
28

-1-

SUPPLEMENTAL DECLARATION OF SGT. MAX FERNANDEZ PURSUANT TO

1 make this declaration from my own personal knowledge, and if called as a witness, I  
2 could and would testify competently to the facts stated below.

3 2. This Supplemental Declaration supplements my Declaration filed  
4 yesterday in this Matter. I make this Declaration in compliance with the Court's  
5 September 20, 2022 Order, to ensure that I have fully and completely addressed the  
6 questions raised by the Court. My prior Declaration addressed the Court's questions  
7 about the application for and issuance of the search warrants in this Matter. This  
8 Declaration provides additional information regarding Question No. 5: "Report what  
9 searches have already been conducted on any computer seized under the warrant, and  
10 who conducted the searches, and what information has been obtained."

11 3. I joined the LASD's Public Corruption unit in October 2020. This  
12 investigation was assigned to me on or about October 26, 2020. The investigation was  
13 opened a year before that, on or about September 11, 2019, when a whistleblower from  
14 the MTA contacted the LASD to report what she believed to be illegal conduct,  
15 including fraudulent conduct in directing contracts to politically connected individuals  
16 and entities; and retaliation against her for reporting same.

17 4. I have seen public statements reported in the media made by various public  
18 figures, alleging that this investigation is some sort of political payback by the Sheriff  
19 against Supervisor Kuehl because of recent political developments and disagreements.  
20 That allegation is false. I know that the allegation is false, because (1) I have worked on  
21 this investigation for two years, and the investigation was begun a year before that, in  
22 September 2019—long before the current political animosities developed; and most  
23 importantly (2) this investigation is based on provable facts, credible witness testimony,  
24 and an undisputed documentary record, that provides probable for the allegations that  
25 County contracts were improperly awarded to Ms. Giggans and POV. The full details of  
26 the investigation, including the evidence reviewed and witnesses interviewed, is set forth  
27 in the affidavit I presented to the court in support of the search warrants obtained in the  
28 Matter. That evidence is abundant and constitutes probable cause to believe that a crime

1 has been committed, in my professional opinion. This is a straightforward investigation  
2 of corruption in the expenditure of public funds—the sort of investigation that every law  
3 enforcement agency in the state conducts on a regular basis, and that prosecutorial  
4 agencies regularly prosecute. This investigation has been conducted throughout  
5 according to standard investigatory practices.

6 5. The full list of items seized during the searches of Supervisor Kuehl's and  
7 Ms. Giggans' residences is attached hereto as Exhibit 1. As noted in my previous  
8 Declaration (Paragraph 7), none of the materials seized in the search of the Office of  
9 Inspector General offices have been reviewed or imaged.

10 6. Exhibit 1 identifies each item, and states whether its contents were imaged.  
11 Items 20, 21, 22, 24, and 25 are paper records, and were not imaged. The technicians  
12 who worked on the imaging are: Thomas Ferguson; Leo Lo; John Moore; Steven  
13 Suarez; Mike Rivas; Julius Gomez; Raquel Gonzales; Claudia Iwaszczyszyn; and Brian  
14 Moreno. Those technicians did not review the contents of any device.

15 7. In sum: none of the contents of any computer seized have been reviewed.  
16 Of the total of 67 devices seized, 49 have been imaged, and one (1) has been partially  
17 imaged. All the imaging was conducted on September 14, 15, and 16, 2022. None of  
18 the contents of any of the devices have been reviewed, except for a review of recent text  
19 messages and voicemails on Supervisor Kuehl's phones as set forth below.

20 8. The only devices from which any content has been reviewed are the two  
21 phones seized from Supervisor Kuehl, and the only content reviewed from those phones  
22 were approximately 250 text messages and two voice mails. I personally conducted that  
23 review on the morning of September 16, 2022. I considered that review to be urgent for  
24 the reasons set forth below.

25 9. The review of the text messages and voicemails on Supervisor Kuehl's  
26 phone in the period prior to the execution of the warrant was urgent because at 8:00 a.m.  
27 on September 14, 2022, while deputies were still at her premises, Supervisor Kuehl gave  
28 a live television interview to Fox 11 News, in which she said the following: "KUEHL: I

1 heard from County Counsel last night that she got a tip from Max that this search would  
2 happen. REPORTER: Max Huntsman? KUEHL: Yes, from Max Huntsman that this  
3 search would happen this morning.”

4 10. In my professional opinion, and based on my training and experience,  
5 tipping off a target of a search warrant prior to the execution of the warrant is a crime.  
6 Penal Code section 148 prohibits obstructing officers in the execution of their duties,  
7 including serving search warrants; and Penal Code 168 prohibits public officials  
8 (prosecutors, judges, clerks, or peace officers) from disclosing the fact that a search  
9 warrant has been issued, prior to its execution, for the purpose of preventing the search  
10 or seizure of property. The only people who knew about the issuance of this search  
11 warrant when it was issued were among those enumerated categories. So, at a  
12 minimum, whoever told Max Huntsman about this warrant committed a crime.

13 11. In the concurrent search of Patricia Giggans’ residence, which took place  
14 at the same time as the search of Supervisor Kuehl’s residence, we were surprised to  
15 find that Ms. Giggans’ phone was not present anywhere in the house or on her person.  
16 The search warrant was executed at 7 a.m. at Ms. Giggans’ residence, and she was  
17 personally present when we arrived. Based on my training and experience, individuals  
18 keep their phones ready to hand, and I know that Ms. Giggans owns and uses an iPhone,  
19 because we have obtained numerous emails sent by her, which contain in the signature  
20 line the phrase, “Sent from my iPhone.” I know from personal experience and from my  
21 training that that phrase is automatically inserted into emails sent from an iPhone. It is  
22 also not plausible or likely that Ms. Giggans would manually type that phrase into the  
23 bottom of every email she sends.

24 12. Because I know that Ms. Giggans has an iPhone, and her phone was not  
25 present in her residence or on her person, I concluded that the most likely explanation  
26 for the absence of her phone was that she was aware that the warrant was going to be  
27 executed, and she disposed of the phone in some manner beforehand. Ms. Giggans’  
28 attorney, Mr. Austin Dove, arrived at her residence approximately 15 minutes into the

1 search. Mr. Dove spoke with the detectives executing the warrant, and said the  
2 following: "There is no phone. You can search for the phone. You're entitled to search  
3 the place." That statement was made by Mr. Dove to Detective Yoon Nam, who told me  
4 about it that same day.

5 13. In addition to constituting a crime under the Penal Code, the act of tipping  
6 off a target of a search warrant to existence of the warrant is a major concern for the  
7 LASD. It creates safety and security risks for officers executing warrants, and it  
8 compromises and impairs the investigation of crimes. In short, we simply cannot have  
9 targets of warrants tipped off the night before. The fact that Supervisor Kuehl publicly  
10 stated she had been tipped off the night before was a serious concern for me and for the  
11 LASD, as to how the information had been obtained and disseminated.

12 14. Accordingly, I reviewed Ms. Kuehl's phones, looking for recent  
13 communications relating to the warrant. I found them. The relevant text messages are  
14 attached hereto as Exhibit 2.

15 15. At 10:17 p.m. on September 13, 2022, Lisa Mandel, Supervisor Kuehl's  
16 Chief of Staff, texted Supervisor Kuehl the following (the full message is attached in  
17 Exhibit 2): "Just got a call from Dawyn Harrison. She has been informed that the  
18 Sheriff may obtained a search warrant for your home and Patti G's.... Per the informant,  
19 the warrant is for 7 a.m. tomorrow. Let me know if you want me to do anything."

20 16. At 11:41 p.m. on September 13, 2022, Dawyn Harrison (who is Acting  
21 County Counsel) texted Supervisor Kuehl the following (the full message is attached in  
22 Exhibit 2): "Was the first my team heard of it. Max called CoCo tonight with his  
23 'intel.'" I know from personal experience and from my training that "CoCo" refers to  
24 County Counsel.

25 17. There are approximately 25 messages relating to the above two messages.  
26 And the two voicemails were from Ms. Harrison, also on the evening of September 13,  
27 2022. Both stated that she had an urgent matter that she needed to discuss with  
28 Supervisor Kuehl.

1           18. The other investigators who have reviewed the same set of text messages I  
2 reviewed from Supervisor Kuehl's phones are Detective Rafael Rafino and Lieutenant  
3 Oscar Veloz.

4           I declare under penalty of perjury under the laws of the State of California that  
5 the foregoing is true and correct.

6           Executed on September 21, 2022, in Los Angeles, California.

7   
8 MAX O. FERNANDEZ  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

## **EXHIBIT 1**



CAT	ITEM #	QUAN	DESCRIPTION	DATE RECEIVED	IMAGED	PROCESSED	PORTABLE CASE	NOTES
EV	1	1	Computers, equipment, & accessories - [REDACTED] color, [REDACTED], with power cord; from Home Ofc Desk (LOC 6) Article: CABLE Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] DOJ File Control Number: [REDACTED] Booked At: OTHER	9/14/2022	Y	Y	N	
EV	2	1	Computers, equipment, & accessories - [REDACTED], Blk, w/cord; home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] DOJ File Control Number: [REDACTED] Booked At: OTHER	9/14/2022	N	N	N	No Data - Drive B/O
EV	3	1	Phones/Cell - Blk [REDACTED] blk/gry case (cracked screen protector); IEMI [REDACTED]; Master BR (LOC 6) Article: Cell Phone Make: [REDACTED] Model: Unknown Serial Number: Unknown Booked At: OTHER	9/14/2022	N	N	N	No Extraction



EV	4	1	Computers, equipment, & accessories - Silv USB "Homeboy Industries"; center drawer of home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Not Applicable Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/14/2022	Y	N	N	No Data in Date Range
EV	5	1	Computers, equipment, & accessories - Blu USB "[REDACTED]"; Top LT drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Not Applicable Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/14/2022	Y	Y	Y	
EV	6	1	Computers, equipment, & accessories - Blk/Silv USB "[REDACTED]"; Top LT drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Unknown Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/14/2022	Y	N	N	No Data in Date Range
EV	7	1	Computers, equipment, & accessories - Blk/Silv USB "[REDACTED]"; Top LT drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Unknown Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/14/2022	Y	N	N	

EV	8	1	Computers, equipment, & accessories - Silv/Wht USB "Futures without violence"; LT middle drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Unknown Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/14/2022	Y	N	N	
EV	9	1	Computers, equipment, & accessories - Silv/Wht USB "Futures without violence"; LT middle drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Unknown Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/14/2022	Y	N	N	
EV	10	1	Computers, equipment, & accessories - Blk, [REDACTED] Ultra, 8GB in clear case, Prod Code [REDACTED]; Top LT drawer home ofc desk (LOC 6) Article: SD CARD Make: [REDACTED] Model: Unknown Serial Number: Unknown Booked At: OTHER	9/14/2022	Y	Y	Y	
EV	11	1	Computers, equipment, & accessories - Red USB "denimdayusa.org"; LT middle drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Unknown Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/14/2022	Y	Y	Y	

EV	12	1	Computers, equipment, & accessories - Blu USB with silv color lanyard "AVB"; LT middle drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Unknown Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/14/2022	Y	Y	N	No Data in Date Range
EV	13	1	Computers, equipment, & accessories - L.Blu PNY USB, 8GB, w/blk lanyard; LT middle drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: PNY Model: Unknown Serial Number: Unknown Booked At: OTHER	9/14/2022	Y	Y	N	No Data in Date Range
EV	14	1	Computers, equipment, & accessories - Wht/Red triangle shaped USB "GUESS logo"; LT middle drawer home ofc desk (LOC 6) Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Unknown Model: Unknown Serial Number: Unknown Booked At: OTHER	9/14/2022	Y	N	N	No Data in Date Range
EV	15	1	Other - Silv [REDACTED] Digital Voice Recorder, [REDACTED]; LT middle drawer home ofc desk (LOC 6) Serial Number: Unknown Booked At: OTHER	9/14/2022	N	N	N	No Data in Date Range

EV	16	1	Phones/Cell - [REDACTED] Cellphone; top middle dresser drawer in SW BR (LOC 6) Article: Cell Phone Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] DOJ File Control Number: [REDACTED] Booked At: OTHER	9/14/2022	Y	Y	Y	
EV	17	1	Phones/Cell - [REDACTED], IMEI [REDACTED]; top middle dresser drawer in SW BR (LOC 6) Article: Cell Phone Make: [REDACTED] Serial Number: Unknown Booked At: OTHER	9/14/2022	N	N	N	No Extraction
EV	18	1	Phones/Cell - Rose Gold color, LG cell phone; top middle dresser drawer in SW BR (LOC 6) Article: Cell Phone Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] DOJ File Control Number: [REDACTED] Booked At: OTHER	9/14/2022	Y	Y	Y	
EV	19	1	Computers, equipment, & accessories - Silv MacBook Pro Laptop with multiple stickers; RT bottom dresser drawer SW BR (LOC 6) Article: LAP TOP COMPUTER Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] DOJ File Control Number: [REDACTED] Booked At: OTHER	9/14/2022	Y	N	N	Encrypted
	20	0			N	N	N	Not Booked at CIC

	21	0			N	N	N	Not Booked at CIC
	22	0			N	N	N	Not Booked at CIC
EV	23	1	Phones/Cell - [REDACTED] Article: Cell Phone Make: [REDACTED] Model: [REDACTED] Serial Number: Unknown Booked At: DETECTIVE BUREAU	9/15/2022	Y	Y	Y	
	24	0			N	N	N	Not Booked at CIC
	25	0			N	N	N	Not Booked at CIC
EV	26	1	Computers, equipment, & accessories - Envelope containing black External Hard Drive, [REDACTED], Black plastic, 1 TB located in "Patty Giggins" Office. Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	Y	N	N	Terminated per Warrant
EV	27	1	Computers, equipment, & accessories - [REDACTED], Desktop, Silver plastic, located in Patty Giggins Office. Article: COMPUTER DISPLAY SCREEN/MONIT Make: [REDACTED] Model: Desktop Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	Y	N	N	

EV	28	1	Computers, equipment, & accessories - Thumbdrive, "██████████", Black plastic with Purple Tether Cord located in Operations Office Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: ██████████ Model: ██████████ Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	29	1	Computers, equipment, & accessories - Thumbdrive, "██████████", Black plastic with Purple Tether Cord located in Operations Office Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Centon Model: ██████████ Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	N	N	Cloned Only
EV	30	1	Computers, equipment, & accessories - Main Server, "Dell Power Edge T-710, gray located in Server Room Article: COMPUTER (CPU) Make: ██████████ Model: ██████████ Serial Number: ██████████ Booked At: OTHER	9/16/2022	Partial	Partial	N	Terminated per Warrant
EV	31	1	Computers, equipment, & accessories - ██████████ computer tower taken from Solis's office during MTA search warrant. Service Tag ██████████ Article: COMPUTER (CPU) Make: ██████████ Model: ██████████ Serial Number: Unknown Booked At: PATROL STATION	9/16/2022	Y	Y	Y	

EV	32	1	Computers, equipment, & accessories - [REDACTED] Laptop from wiggins office during MTA search warrant Article: LAP TOP COMPUTER Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] Booked At: PATROL STATION	9/16/2022	Y	Y	Y	
EV	33	1	Computers, equipment, & accessories - blk/sil METRO thumbdrive from wiggins office from MTA search warrant Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Not Applicable Model: Unknown Serial Number: Not Applicable Booked At: PATROL STATION	9/16/2022	Y	Y	Y	
EV	34	1	Computers, equipment, & accessories - [REDACTED] computer tower from wiggins office from MTA search warrant, [REDACTED] Article: COMPUTER (CPU) Make: [REDACTED] Model: [REDACTED] Serial Number: Unknown Booked At: PATROL STATION	9/16/2022	Y	Y	Y	
EV	35	1	Computers, equipment, & accessories - Blk/Sil [REDACTED] laptop from solis's office during MTA search warrant. Article: LAP TOP COMPUTER Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	Y	Y	Y	

EV	36	1	Computers, equipment, & accessories - Blk/Sil [REDACTED] computer tower from Soli's office during MTA search warrant. [REDACTED] Article: COMPUTER (CPU) Make: [REDACTED] Model: [REDACTED] Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	37	1	Computers, equipment, & accessories - Blk/Sil [REDACTED] computer tower from Avila's office during MTA search warrant. [REDACTED] Article: COMPUTER (CPU) Make: [REDACTED] Model: [REDACTED] Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	N	N	
EV	38	1	Computers, equipment, & accessories - Blk/Sil [REDACTED] Computer tower from Bercerra's office during MTA search warrant. [REDACTED] Article: COMPUTER (CPU) Make: [REDACTED] Model: [REDACTED] Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	N	N	
EV	39	1	Computers, equipment, & accessories - Sil/Org portable hard drive from Becerra's office during MTA search warrant and blk cable Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: Not Applicable Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	N	N	N	Not Assigned - Not in Search Warrant



EV	40	1	Computers, equipment, & accessories - Sil/Ylw 2GB [REDACTED] thumbdrive from Becerra's office during MTA search warrant Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Not Applicable Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	41	1	Phones/Cell - Blk apple cellphone from Becerra's office during MTA search warrant. Sim card attached to back. Article: Cell Phone Make: [REDACTED] Model: [REDACTED] Serial Number: Unknown Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	42	1	Computers, equipment, & accessories - Blk/Sil [REDACTED] computer tower from Hernandez's office during MTA search warrant. [REDACTED] Article: COMPUTER (CPU) Make: [REDACTED] Model: [REDACTED] Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	N	N	
EV	43	1	Computers, equipment, & accessories - Blk [REDACTED] 500GB drive from Herandez's office, inside plastic wrap belonging to Jeniffer Loew. Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	Y	Y	Y	

EV	44	1	Computers, equipment, & accessories - Blk/Sil [REDACTED] computer tower from Hernandez's office during MTA search warrant. [REDACTED] Article: COMPUTER (CPU) Make: [REDACTED] Model: [REDACTED] Serial Number: Not Applicable Booked At: OTHER	9/16/2022	N	N	N	Not Booked at CIC
EV	45	1	Computers, equipment, & accessories - 2 red/blk 32GB [REDACTED] thumbdrives from Hernandez's office. Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	
A38:	46	1	Computers, equipment, & accessories - red/blk 4GB Innovera thunbdrive from Hernandez's office Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	N	N	
EV	47	1	Computers, equipment, & accessories - blk 32GB [REDACTED] thumbdrive from Hernandez's office Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	

EV	48	1	Computers, equipment, & accessories - whi/grn [REDACTED] 64GB thumbdrive from Hernandez's office Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	49	1	Computers, equipment, & accessories - Sil/Blk/Whi METRO thunbdrive from Hernandez's office Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Not Applicable Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	N	No Data in Date Range
EV	50	1	Computers, equipment, & accessories - Blk/Sil [REDACTED] computer tower from Englund's office. S [REDACTED] [REDACTED] Article: COMPUTER (CPU) Make: [REDACTED] Model: [REDACTED] Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	N	N	
EV	51	1	Computers, equipment, & accessories - red/sil 8GB thumbdrive from Englund's office during MTA search warrant. Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: Not Applicable Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	

EV	52	1	Electronics (audio, TV) - blk sanyo tape recorder from kuehls house Article: Other Make: [REDACTED] Model: [REDACTED] Serial Number: Not Applicable Booked At: OTHER	9/16/2022	N	N	N	No Date in Date Range
EV	53	1	Computers, equipment, & accessories - Silver [REDACTED] computer Article: LAP TOP COMPUTER Make: [REDACTED] Model: Unknown Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	N	N	N	Encrypted
EV	54	1	Computers, equipment, & accessories - SILVER APPLE COMPUTER Article: LAP TOP COMPUTER Make: [REDACTED] Model: Unknown Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	N	N	N	Partial Image
EV	55	1	Phones/Cell - rose gold [REDACTED] cellphone with blu case taken from Kuehl's residence. Article: Cell Phone Make: [REDACTED] Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	

EV	56	1	Computers, equipment, & accessories - SILVER [REDACTED] COMPUTER Article: LAP TOP COMPUTER Make: [REDACTED] Model: Unknown Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	57	1	Computers, equipment, & accessories - sil [REDACTED] cd drive and whi cable from kuehl's residence Article: OTHER Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	N	N	N	CD Player
EV	58	1	Phones/Cell - ROSE GOLD [REDACTED] Article: Cell Phone Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	N	N	N	Damaged Phone/No Extraction
EV	59	1	Computers, equipment, & accessories - sil [REDACTED] 80GB computer drive Article: OTHER Make: [REDACTED] Model: [REDACTED] Serial Number: Not Applicable Booked At: OTHER	9/16/2022	N	N	N	Damaged Phone/No Extraction
EV	60	1	Cameras: Equip & Access - sil nikon coolpix digital camera from kuehl's residence Article: CAMERA Make: nikon Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	N	N	

EV	61	1	Cameras: Equip & Access - blk [REDACTED] sx110 digital camera from kuehls residence. Article: CAMERA Make: [REDACTED] Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	62	1	Computers, equipment, & accessories - red [REDACTED] 4 GB thumbdrive with zelda paperwork from kuehls residence Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: sandisk Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	N	N	
EV	63	1	Computers, equipment, & accessories - blu 16GB [REDACTED] thumbdrive from kuehls residence Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	64	1	Computers, equipment, & accessories - USB DRIVE [REDACTED] 1GB Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: [REDACTED] Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	Y	N	N	

EV	65	1	Computers, equipment, & accessories - whi 256GB [REDACTED] thumbdrive from kuehls residence Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: [REDACTED] Model: Not Applicable Serial Number: Not Applicable Booked At: OTHER	9/16/2022	Y	Y	Y	
EV	66	1	Computers, equipment, & accessories - USB DRIVE 1GB Article: EXTERNAL DRIVES (HARD DRIVE, USB) Make: SCAN DISK Model: [REDACTED] Serial Number: [REDACTED] Booked At: OTHER	9/16/2022	Y	N	N	
EV	67	1	CDs/Video - cd disc labeled LA political roast from kuels residence Booked At: OTHER	9/16/2022	N	N	N	Not Assigned - Not in Search Warrant

## **EXHIBIT 2**





**PROOF OF SERVICE - 1013A(3), 2015.5 C.C.P.)**

STATE OF CALIFORNIA )  
 ) ss.  
COUNTY OF LOS ANGELES )

I am employed in the County of Los Angeles, State of California at above the age of 18 and no part thereof with action in business address 188 West Sixth Street Suite 400 Los Angeles California 90017.

On September 22, 2022, I served the foregoing document, described as

**SUPPLEMENTAL DECLARATION OF SGT. MAX FERNANDEZ URGENT TO COURT'S  
ORDER DATED SEPTEMBER 30, 2022**

on all interested parties listed below by transmitting to all interested parties a true copy hereof as follows:

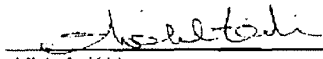
<b>Cheryl O'Connor, Esq.</b> JONES DAY 3161 Michelson Drive, Suite 800 Irvine, CA 92612 [REDACTED]	<b>Robert Dugdale, Esq.</b> KENDALL BRILL & KELLY LLP 10100 Santa Monica Blvd., Suite 1725 Los Angeles, CA 90067 [REDACTED]
<b>Harvinder S. Anand, Esq.</b> ANAND LAW GROUP 790 E. Colorado Blvd., # 900 Pasadena, CA 91101 [REDACTED]	<b>Dawyn Harrison, Esq.</b> Office of the County Counsel, 648 Hahn Hall of Admin. 500 W Temple St, Los Angeles, CA 90012 [REDACTED]

☒ **BY MAIL** by placing a true copy thereof enclosed in a sealed envelope addressed as set forth above. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one (1) day after date of deposit for mailing in affidavit.

☒ **BY ELECTRONIC TRANSMISSION** by transmitting a PDF version of the document(s) by electronic mail to the party(s) identified on the service list using the e-mail address(es) indicated.

☒ I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on September 22, 2022, in Los Angeles, California

  
Michele Kirk

# **ATTACHMENT C**



**COUNTY OF LOS ANGELES  
OFFICE OF THE COUNTY COUNSEL**

418 KENNETH MAHN HALL OF ADMINISTRATION  
500 WEST TEMPLE STREET  
LOS ANGELES, CALIFORNIA 90012-2711

DAWYN R. HARRISON  
Acting County Counsel

September 21, 2022

TELEPHONE  
(213) 974-1801  
FACSIMILE  
(213) 626-7446  
TDD  
(213) 633-6901

**CONFIDENTIAL**

THIS MATERIAL IS SUBJECT TO THE  
ATTORNEY-CLIENT AND/OR THE ATTORNEY  
WORK PRODUCT PRIVILEGES

VIA EMAIL AND U.S. MAIL

The Honorable Alex Villanueva  
Sheriff, Los Angeles County  
211 West Temple Street, 8<sup>th</sup> Floor  
Los Angeles, California 90012

**Re: Response to Your September 20, 2022 Letter**

Dear Sheriff Villanueva:


This in response to your letter dated September 20, 2022, stating you are refusing Bill Seki as counsel for the County of Los Angeles Sheriff's Department ("LASD") and engaging the appropriate counsel.

First, all the issues raised in your letter are moot. Yesterday, California Attorney General Rob Bonta notified Undersheriff Murakami that his office is assuming responsibility for: a) any investigation into whether individuals committed a crime by giving advance warning of the search warrants to Supervisor Kuehl and Patricia Giggans; and b) the underlying investigation of Peace Over Violence, Patricia Giggans, Supervisor Sheila Kuehl, Los Angeles Metropolitan Transportation Authority, etc., including the warrants issued in 2021 and 2022. As you acknowledged previously, the Attorney General has the authority to assume these responsibilities because he has complete supervisory authority over you and may direct your and LASD's investigative activities. In the Attorney General's letter he stated the LASD "should cease its investigative activity and refrain from any actions in furtherance of these investigations, including public statements or court filings related to the investigations." Based on that directive, you did not have authority to send your September 20, 2022, letter, nor does the LASD require legal services relating to the continued investigation by the Attorney General. To the extent that counsel is required for the LASD to explain prior conduct in connection with the 2021 and 2022 warrant proceedings, Mr. Seki will continue to represent the LASD.

HDA 103848555 5

The Honorable Alex Villanueva  
September 21, 2022  
Page 2

Second, I wanted to remind you that only the Office of County Counsel, or the law firms we retain, may represent you, in your official capacity, and the LASD.<sup>1</sup> Further, even if all of the requirements of Government Code section 31000.6 – Employment of Legal Counsel to Assist Assessor or Sheriff; Conflicts of Interest - are met and conflict of interest counsel is deemed appropriate for you in your official capacity, the conflict counsel must be retained through my office.<sup>2</sup> Therefore, you have no authority to retain your own counsel to represent either you or the LASD, nor is the County of Los Angeles responsible for any of the costs incurred by those law firms. I recently discovered that you improperly retained Werksman Jackson & Quinn LLP in this matter. I will notify them that they have no authority to represent you or LASD and will not be paid by the County of Los Angeles, and I will copy the Attorney General's Office.

Very truly yours,  
  
DAWYN R. HARRISON  
Acting County Counsel

DRH:gl

Enclosures

c: Timothy K. Murakami, Undersheriff

John L. Satterfield, Commander  
Chief of Staff

---

<sup>1</sup> Government Code section 25203 establishes that the board of supervisors shall "direct and control the conduct of litigation in which the county, or any public entity of which the board is the governing body, is a party." Los Angeles County Charter Article VI, section 21 vests County Counsel with "exclusive charge and control of all civil actions and proceedings in which the County or any officer thereof, is concerned or is a party" (footnotes omitted). By law, the Office of County Counsel is charged with providing legal advice, on behalf of the Board, to constituent entities and officials within the County. California Government Code section 23005 (County exercises authority "only through the board of supervisors" or its authorized agents); id. § 25203 (the Board shall "direct and control the conduct of litigation in which the county, or any public entity of which the board is the governing body, is a party"); Los Angeles, California, County Charter Article VI, section 21 (County Counsel is vested with "exclusive charge and control of all civil actions and proceedings in which the County or any officer thereof, is concerned or is a party" (footnotes omitted)).

<sup>2</sup> Government Code section 31000.6; Please see the attached orders from *County of Los Angeles v. Sheriff Alex Villanueva, et al.* regarding assignment of counsel.

**OFFICE OF THE SHERIFF****COUNTY OF LOS ANGELES****DEPT. OF JUSTICE****ALEX VILLANUEVA, SHERIFF**

September 20, 2022

Dawyn Harrison, Acting County Counsel  
County of Los Angeles – Office of the County Counsel  
500 West Temple Street, Suite 648  
Los Angeles, California 90012

Dear Ms. Harrison:

**DEMAND FOR DEFENSE COUNSEL**

It appears clear you have no intention of removing your office's control as counsel to the Department on this matter. Unless I misunderstood, you insist we continue to communicate and seek advice from your Senior Assistant County Counsel, Mr. Jason Gonzalez, and Mr. Bill Seki, as stated in your letter.

As you are aware, the morning of the search warrant service Supervisor Shelia Kuehl stated to reporters, *"I heard from County Counsel last night that she got a tip from Max Huntsman that the search would happen this morning."* In the event you have not heard the statement for yourself, it was aired by every local news channel, and it is posted on all LASD social media accounts.

Ms. Kuehl's allegation that you, or a representative from your office, and Mr. Huntsman provided her with advanced knowledge of a criminal search warrant in which she was a suspect makes it unethical and inappropriate for your office to have further access to information or decision making regarding this matter. Moreover, by retaining the services of Bill Seki, there is a clear further potential for you, or your office, to interfere in the filing of motions and overall employment status of Mr. Seki. I must also highlight, based on Supervisor Kuehl's statements and Attorney General Rob Bonta's announcement today, both you and your office are likely to become the focus of a criminal investigation by the Office of the Attorney General, and as such the conflict of interest is undeniable.

Since you intend to continue blocking any independent counsel, we are forced to seek appropriate counsel in order to prevent further interference and/or obstruction of our investigation by your office. Under the State Bar Rule 1.6, the potential for Mr. Seki to report information or communications to your office, and seek approval or denial for legal strategy, regarding our investigation disqualifies him as counsel. Based on this, we can no longer accept Mr. Seki as counsel and decline his further legal services.

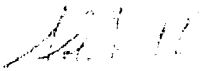
Ms. Harrison

-2-

September 20, 2022

If I misunderstood your position, please advise. Due to the exigency of this pending matter, the Department will engage the appropriate counsel and inform you once retained. Should you have any questions, please contact Undersheriff Timothy Murakami, at [REDACTED] Thank you for your anticipated cooperation with this matter.

Sincerely,



ALEX VILLANUEVA  
SHERIFF

AV:JLS:js

c: Jason Gonzalez, Senior Assistant County Counsel



**COUNTY OF LOS ANGELES  
OFFICE OF THE COUNTY COUNSEL**

648 KENNETH HAHN HALL OF ADMINISTRATION  
500 WEST TEMPLE STREET  
LOS ANGELES, CALIFORNIA 90012-2713

**DAWYN R. HARRISON**  
Acting County Counsel

September 20, 2022

TELEPHONE  
(213) 974-1801  
FACSIMILE  
(213) 626-7446  
TDD  
(213) 633-0901

**CONFIDENTIAL**

THIS MATERIAL IS SUBJECT TO THE  
ATTORNEY-CLIENT AND OR THE ATTORNEY  
WORK PRODUCT PRIVILEGES

VIA EMAIL AND U.S. MAIL

The Honorable Alex Villanueva  
Sheriff, Los Angeles County  
211 West Temple Street, 8<sup>th</sup> Floor  
Los Angeles, California 90012

**Re: Response to Your September 19, 2022 Letter**

Dear Sheriff Villanueva:

I am in receipt of your letter from yesterday requesting counsel to handle the court proceedings related to the warrants issued on Wednesday, September 14, 2022 ("2022 Warrants"). After reviewing the letter, I believe Undersheriff Murakami has not had a chance to let you know that Bill H. Seki, a partner at Seki, Nishimura & Watase, was assigned to handle the 2022 Warrants matters last week. It was our understanding, based on your and Undersheriff Murakami's press statements, that you were recused from handling the 2022 Warrants. As a result, we communicated directly with Undersheriff Murakami about assigning the defense of the 2022 Warrants to Mr. Seki and his firm on September 16, 2022, the day he made a request for counsel. Your department did not seek my office's assistance when it prepared the 2022 Warrants nor did it request to use Mr. Seki's professional services to assist in the preparation of the 2022 Warrants. Therefore, we had to quickly gather the necessary facts and perform an ethical and legal review when the Undersheriff requested counsel on September 16, 2022.

By way of background, Mr. Seki has been representing your department on the warrants issued in February and March of 2021 to the Los Angeles County Metropolitan Transportation Authority (Metro), Office of the Inspector General of the Metro (OIG), and Peace Over Violence ("2021 Warrants") since March 2021. Mr. Seki has actively responded to multiple motions challenging the warrants,

HOA.103846887.3



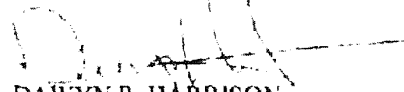
The Honorable Alex Villanueva  
September 20, 2022  
Page 2

communicated with your department about the warrants, and made several appearances defending the warrants for your department, including the last one in front of the Honorable Eleanor Hunter on September 1, 2022, addressing the scope of the 2021 Warrants and ordering the assignment of a Special Master.

When Mr. Seki was retained to provide his professional services for the 2021 and 2022 Warrants, confidentiality silos were created. Those confidentiality silos are in effect and will remain that way until the conclusion of these matters. As to the other claims you make in your letter, I deny them and will not further acknowledge them with a response.

If you have any questions about the 2021 or 2022 Warrants, please contact Mr. Seki at (213) 481-2869, or Senior Assistant County Counsel Jason Gonzalez at (213) 974-1975.

Very truly yours,



DAWYN R. HARRISON  
Acting County Counsel

DRH:gl

c: Timothy K. Murakami, Undersheriff

John L. Satterfield, Commander  
Chief of Staff

HOA.103846887.3



# OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

**HALL OF JUSTICE**

ALEX VILLANUEVA, SHERIFF



September 19, 2022

Dawyn Harrison, Acting County Counsel  
County of Los Angeles - Office of the County Counsel  
500 West Temple Street, Suite 648  
Los Angeles, California 90012

Dear Ms. Harrison:

## ***DEMAND FOR DEFENSE COUNSEL***

Per Government Code § 995, this correspondence will serve as my demand as the elected Sheriff of Los Angeles County Sheriff's Department (Department) for defense counsel regarding: the service of search warrants against Metropolitan Transit Authority (MTA)/Kuehl/Giggans/Peace over Violence, wherein the Board of Supervisors is obligated to provide a defense. As you are aware, in Supervisor Kuehl's press interview<sup>1</sup>, she explicitly named Max Huntsman, the Head of the Office Inspector General (OIG) and County Counsel, as involved in forewarning her on the service of the search warrant as to the exact date and time, which unequivocally shows your office cannot be involved, or provide legal advice regarding this matter and must assign separate and independent counsel to my office. Based on Supervisor Kuehl's statements, you or your office interfered in this matter, along with Mr. Huntsman. Consequently, your office and Mr. Huntsman, must legally and ethically recuse yourselves and any of your contract counsel from this matter, and provide me and the Los Angeles County Sheriff's Department independent counsel.

As you are aware, Government Code § 995, except as otherwise provided in Sections 993.2 and 993.4, upon request of an employee or former employee, a public entity shall provide for the defense of any civil action or proceeding brought against him, in his official or individual capacity or both, on account of an act or omission in the scope of his employment as an employee of the public entity. For the purposes of this part, a cross-action, counterclaim or cross-complaint against an employee or former employee shall be deemed to be a civil action or proceeding brought against him.

<sup>1</sup> LASDHQ Twitter Account. Statement by Supervisor Shelia Kuehl to the media  
[https://www.twttr.com/LASDHQ/status/1362579644499727362?ref\\_src=twsrc%5Ftfw](https://www.twttr.com/LASDHQ/status/1362579644499727362?ref_src=twsrc%5Ftfw)

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1850 —

Ms. Harrison

-2-

September 19, 2022

Moreover, Government Code § 995.2 (b), provides in part: If an employee or former employee requests in writing that the public entity, through its designated legal counsel, provide for a defense, the public entity shall, within 20 days, inform the employee or former employee whether it will or will not provide a defense, and the reason for the refusal to provide a defense.

Furthermore, as you are also aware, Government Code § 25303 provides in part: This section shall not be construed to affect the independent and constitutionally and statutorily designated investigative and prosecutorial functions of the sheriff and district attorney of a county. The board of supervisors shall not obstruct the investigative function of the sheriff of the county nor shall it obstruct the investigative and prosecutorial function of the district attorney of a county.

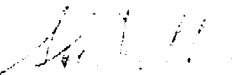
Finally, Los Angeles County Code of Ordinances § 6.44.190. provides in part: The OIG shall not disclose, without the Sheriff's authorization, any of the Sheriff's Department's confidential personnel, investigative, or disciplinary information unless such information is already a matter of public record.

Should you fail to provide defense counsel in this matter, I will ask the court to order you, on behalf of the Board of Supervisors, to comply with their obligation by a Petition for Writ of Mandate.

As you are also aware, if you deny my demand for counsel, I am entitled to recover from the public entity such reasonable attorney's fees, costs and expenses as are necessarily incurred in defending the action or proceeding if the action or proceeding arose out of an act or omission in the scope of his employment as an employee of the public entity. See, Sparks v. Kern County (2009) 173 Cal App. 4th 194.

Your response in writing is due by the end of the next business day from the date of this letter, Tuesday, September 20, 2022. Upon receipt, we will advise of the firm of my choosing. Should you have any questions, please contact my Chief of Staff, Commander John Satterfield, at [REDACTED]. Thank you for your anticipated cooperation with this matter.

Sincerely,



ALEX VILLANUEVA  
SHERIFF

**Fwd: Latest MTA/Kuehl/Giggans warrants**

From: [REDACTED]@counsel.lacounty.gov  
Sent: Wednesday, September 14, 2022 5:19 PM  
To: [REDACTED]@law.com  
Cc: [REDACTED]@counsel.lacounty.gov  
Subject: Latest MTA/Kuehl/Giggans warrants

Hi Bill

I know you've had some conversations with Lana today about the newest round of warrants served by LASD this morning in the MTA/Kuehl/Giggans matter, and I just wanted to advise that County Counsel is not currently authorizing you to appear/voice on those warrants on behalf of the Sheriff's Department. Please let me know if you have any questions. Thanks,

[REDACTED]  
Assistant County Counsel  
[REDACTED] Division



Los Angeles County Sheriff's Department

September 16 at 11:49 AM

...

LA County Counsel Terminates LASD's Lawyer Same Day Supervisor Kuehl's Warrant Is Challenged in Court

In an unprecedented move of retaliation after Wednesday's lawful service of a search warrant on the residence of Supervisor Shelia Kuehl and others, the Board of Supervisor's Office of County Counsel has terminated the services of LASD's legal representation. Simply put, the Board of Supervisors and County Counsel fired our lawyer the same day our search warrant was challenged in court and an emergency hearing was set for September 22, 2022.

This is exactly the type of obstruction, interference, and political shenanigans which Sheriff Alex Villanueva fights against daily. We are now forced into a position of being unrepresented with no County authorization to pay for legal representation and reduced to solicit pro bono representation in this matter.

If Supervisor Shelia Kuehl, Commissioner Patty Giggins, The Board of Supervisors, County Counsel and the Office of the Inspector General are as committed to transparency and accountability as they continuously state, then why are they scared for these electronic devices to be examined and fighting the search warrant?

Find Latest MTA/Kuehl/Giggins warrants

From: [REDACTED]  
Sent: Wednesday, September 14, 2022, 11:49 AM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: Latest MTA/Kuehl/Giggins warrants

1. [REDACTED]  
2. [REDACTED]  
3. [REDACTED]  
4. [REDACTED]  
5. [REDACTED]  
6. [REDACTED]  
7. [REDACTED]  
8. [REDACTED]  
9. [REDACTED]  
10. [REDACTED]  
11. [REDACTED]  
12. [REDACTED]  
13. [REDACTED]  
14. [REDACTED]  
15. [REDACTED]  
16. [REDACTED]  
17. [REDACTED]  
18. [REDACTED]  
19. [REDACTED]  
20. [REDACTED]  
21. [REDACTED]  
22. [REDACTED]  
23. [REDACTED]  
24. [REDACTED]  
25. [REDACTED]  
26. [REDACTED]  
27. [REDACTED]  
28. [REDACTED]  
29. [REDACTED]  
30. [REDACTED]  
31. [REDACTED]  
32. [REDACTED]  
33. [REDACTED]  
34. [REDACTED]  
35. [REDACTED]  
36. [REDACTED]  
37. [REDACTED]  
38. [REDACTED]  
39. [REDACTED]  
40. [REDACTED]  
41. [REDACTED]  
42. [REDACTED]  
43. [REDACTED]  
44. [REDACTED]  
45. [REDACTED]  
46. [REDACTED]  
47. [REDACTED]  
48. [REDACTED]  
49. [REDACTED]  
50. [REDACTED]  
51. [REDACTED]  
52. [REDACTED]  
53. [REDACTED]  
54. [REDACTED]  
55. [REDACTED]  
56. [REDACTED]  
57. [REDACTED]  
58. [REDACTED]  
59. [REDACTED]  
60. [REDACTED]  
61. [REDACTED]  
62. [REDACTED]  
63. [REDACTED]  
64. [REDACTED]  
65. [REDACTED]  
66. [REDACTED]  
67. [REDACTED]  
68. [REDACTED]  
69. [REDACTED]  
70. [REDACTED]  
71. [REDACTED]  
72. [REDACTED]  
73. [REDACTED]  
74. [REDACTED]  
75. [REDACTED]  
76. [REDACTED]  
77. [REDACTED]  
78. [REDACTED]  
79. [REDACTED]  
80. [REDACTED]  
81. [REDACTED]  
82. [REDACTED]  
83. [REDACTED]  
84. [REDACTED]  
85. [REDACTED]  
86. [REDACTED]  
87. [REDACTED]  
88. [REDACTED]  
89. [REDACTED]  
90. [REDACTED]  
91. [REDACTED]  
92. [REDACTED]  
93. [REDACTED]  
94. [REDACTED]  
95. [REDACTED]  
96. [REDACTED]  
97. [REDACTED]  
98. [REDACTED]  
99. [REDACTED]  
100. [REDACTED]

# **ATTACHMENT D**

761551N25A - SH - AD - 32A (2/72)

COUNTY OF LOS ANGELES  
**SHERIFF'S DEPARTMENT**

"A Tradition of Service"

OFFICE CORRESPONDENCE

DATE: December 17, 2004

FILE NO.

FROM: ALEX VILLANUEVA, SERGEANT CARSON STATION	TO: DIVISION CHIEFS AND COMMANDERS
---	------------------------------------

SUBJECT: AN OPEN LETTER

The purpose of this memorandum is to dispel any rumors and inform you of my intentions regarding my future with our Department. As you all well know, I have been exhausting all administrative remedies to address my denial of promotion stemming from the 2003 Lieutenant Examination, and now I have read the most recent Intent to Promote teletype for lieutenants. As expected, I was not included on this list for reasons you know in more detail than I do, as I can only speculate what transpires behind closed doors.

Up to this point in time my experience, education, leadership, and communication skills have always served me well. During my ten years experience with the United States military I was privileged to have been promoted six times to positions of higher rank and responsibility. Perhaps this experience has burnished in me an expectancy of merit based promotions, and this expectancy was unrealistically carried over to our Department.

From what I have come to understand regarding ethical administrative behavior, I find no legal or moral justification for the activities you have engaged in over the course of the last year and a half. From rewriting oral interview scoring standards in order to deliberately suppress exam scores, providing secret exam preparation classes for the privileged few, and gaming the appeals process in order to gerrymander the candidate pool, you have compromised your integrity and that of the Department's.

Perhaps you have succumbed to a moral inversion, wherein you believe your actions and those of your peers are in the best interest of the Department and supported by civil service rules. Your decision making is a result of group-think and the feeling of infallibility, making it difficult for you to see beyond your own career success. I want to encourage each and every one of you to take a moment and engage in critical reflexivity, the ability to see the organization through someone else's experience.

My organizational experience has told me that I do not count, no matter what my qualifications may be, how hard I work, or how many bright ideas I possess. I do not get "invited" to apply to jobs, nor are jobs created exclusively for me. There is no captain or higher pushing aside more qualified individuals in order to make room for me, or steering me in the "right" direction. There is no rater who overlooks my shortcomings and gives me undeserved outstanding evaluations or 100 AP's. My queries are addressed with attorneys and mind-numbing technical rationality.

Promoting dozens of individuals to the rank of lieutenant is a wonderful opportunity to assert organizational values such as meritocracy, equality, and diversity, while at the same time promoting efficiency and effectiveness, and boosting the moral of the Department. Instead you deliberately chose the values of cronyism, nepotism, and tokenism. These have been the same values you have been espousing with just about every promotional process within our ranks. This negatively impacts public safety by promoting corruption and incompetence.

I am curious to know just how much public resources you will squander as you attempt to defend the indefensible. Deliberately attempting to suppress or retard the upward mobility of Latinos on our Department is illegal, immoral, and politically incomprehensible. Each and every one of you contributes to this unfolding tragedy by your actions or inactions. I will say this: as a Latino, I do not seek special favors, accommodations, or any sort of "affirmative action" in order to receive a promotion. I expect to be promoted because there is a clearly identified universal standard based on bonafide occupational qualifications, not golf handicaps or quotas.

It has been painful watching you lie, obfuscate, conceal, mislead, or otherwise attempt to hide the truth. I want to encourage you to come to grips with the damage you inflict on our institution, and do what's right. In an interesting parallel to our Department, NASA swore after the Challenger tragedy that it should never happen again, then along came Columbia. After spending over \$30 million addressing Borman, it is truly frightening to behold how little has been learned.

Leadership is defined by action, not position, and I plan to act decisively to assert my rights, not only as an employee, but as a citizen and proud resident of this County. Your legacy and the future of equality and equal opportunity in Los Angeles County are at a crossroads. I hope you make the right choices for the benefit of the County and the Department, and I must remind you that it is 2004, not 1964. Just as in Martin Luther King's day, I am confident of the supremacy of a simple idea - all men are created equal.

AV:av



# EXHIBIT 60

## **Facebook Live Session as Sheriff**

March 29, 2022	<a href="https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/522728616119043">https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/522728616119043</a>
April 6, 2022	<a href="https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/501939348145181">https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/501939348145181</a>
April 13, 2022	<a href="https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/546392800535820">https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/546392800535820</a>
April 20, 2022	<a href="https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/529858718671404">https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/529858718671404</a>
April 27, 2022	<a href="https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/532969048436229">https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/532969048436229</a>
June 15, 2022	<a href="https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/423962582707176">https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/423962582707176</a>
June 29, 2022	<a href="https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/3174151812859559">https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/3174151812859559</a>
July 6, 2022	<a href="http://facebook.com/LosAngelesCountySheriffsDepartment/videos/738191310825776">http://facebook.com/LosAngelesCountySheriffsDepartment/videos/738191310825776</a>
July 13, 2022	<a href="https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/121687392218530">https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/121687392218530</a>
July 27, 2022	<a href="https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/463477241916098">https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/463477241916098</a>
October 5, 2022	<a href="https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/910390840202738">https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/910390840202738</a>
October 29, 2022	<a href="https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/529232429042986">https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/529232429042986</a>
October 26, 2022	<a href="https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/2239513846207174">https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/2239513846207174</a>
November 2, 2022	<a href="https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/1273102586757725">https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/1273102586757725</a>
November 3, 2022	<a href="https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/1869313026777410">https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/1869313026777410</a>
November 15, 2022	<a href="https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/6029944173723452">https://www.facebook.com/LosAngelesCountySheriffsDepartment/videos/6029944173723452</a>

# EXHIBIT 61

## **Facebook Live Sessions December 2022 – January 2024**

January 4, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/604840011404230">https://www.facebook.com/sheriffvillanueva33/videos/604840011404230</a>
January 11, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/3437704796546289">https://www.facebook.com/sheriffvillanueva33/videos/3437704796546289</a>
January 18, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/152882667125008">https://www.facebook.com/sheriffvillanueva33/videos/152882667125008</a>
January 25, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/862801968161374">https://www.facebook.com/sheriffvillanueva33/videos/862801968161374</a>
February 1, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1190399635175401">https://www.facebook.com/sheriffvillanueva33/videos/1190399635175401</a>
February 15, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1642561526514672">https://www.facebook.com/sheriffvillanueva33/videos/1642561526514672</a>
February 22, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1162913564390010">https://www.facebook.com/sheriffvillanueva33/videos/1162913564390010</a>
March 1, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1400000157414702">https://www.facebook.com/sheriffvillanueva33/videos/1400000157414702</a>
March 8, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/746395690474471">https://www.facebook.com/sheriffvillanueva33/videos/746395690474471</a>
March 15, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/763725695174548">https://www.facebook.com/sheriffvillanueva33/videos/763725695174548</a>
March 29, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/3482143328709824">https://www.facebook.com/sheriffvillanueva33/videos/3482143328709824</a>
April 5, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1284144142483735">https://www.facebook.com/sheriffvillanueva33/videos/1284144142483735</a>
April 12, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1952644871756990">https://www.facebook.com/sheriffvillanueva33/videos/1952644871756990</a>
April 26, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/138447085755505">https://www.facebook.com/sheriffvillanueva33/videos/138447085755505</a>
May 3, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1366904644099163">https://www.facebook.com/sheriffvillanueva33/videos/1366904644099163</a>
May 10, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/146559301758384">https://www.facebook.com/sheriffvillanueva33/videos/146559301758384</a>
May 17, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/51043588117417">https://www.facebook.com/sheriffvillanueva33/videos/51043588117417</a>
May 24, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/761152789084778">https://www.facebook.com/sheriffvillanueva33/videos/761152789084778</a>
May 31, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/6703313173059854">https://www.facebook.com/sheriffvillanueva33/videos/6703313173059854</a>
June 7, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/6207387342712433">https://www.facebook.com/sheriffvillanueva33/videos/6207387342712433</a>
June 14, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1710910619344039">https://www.facebook.com/sheriffvillanueva33/videos/1710910619344039</a>
June 21, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/969388391011586">https://www.facebook.com/sheriffvillanueva33/videos/969388391011586</a>
June 28, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/222040553545919">https://www.facebook.com/sheriffvillanueva33/videos/222040553545919</a>
July 5, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/939517077278674">https://www.facebook.com/sheriffvillanueva33/videos/939517077278674</a>
July 12, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/201753882525705">https://www.facebook.com/sheriffvillanueva33/videos/201753882525705</a>
July 19, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/285229794026036">https://www.facebook.com/sheriffvillanueva33/videos/285229794026036</a>
July 26, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/2403433039818293">https://www.facebook.com/sheriffvillanueva33/videos/2403433039818293</a>
August 2, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/805152664489046">https://www.facebook.com/sheriffvillanueva33/videos/805152664489046</a>
August 9, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/6918639068148147">https://www.facebook.com/sheriffvillanueva33/videos/6918639068148147</a>
August 16, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/671383298218510">https://www.facebook.com/sheriffvillanueva33/videos/671383298218510</a>
August 23, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/2775561782587028">https://www.facebook.com/sheriffvillanueva33/videos/2775561782587028</a>
August 30, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1229457997722077">https://www.facebook.com/sheriffvillanueva33/videos/1229457997722077</a>
September 6, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1651805581998607">https://www.facebook.com/sheriffvillanueva33/videos/1651805581998607</a>
September 13, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1359309531684573">https://www.facebook.com/sheriffvillanueva33/videos/1359309531684573</a>
September 20, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/780807103802967">https://www.facebook.com/sheriffvillanueva33/videos/780807103802967</a>
September 27, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/247414181632325">https://www.facebook.com/sheriffvillanueva33/videos/247414181632325</a>
October 4, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/3463187880587617">https://www.facebook.com/sheriffvillanueva33/videos/3463187880587617</a>
October 18, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/975453756888710">https://www.facebook.com/sheriffvillanueva33/videos/975453756888710</a>
October 25, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/882857893553472">https://www.facebook.com/sheriffvillanueva33/videos/882857893553472</a>

November 1, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/645529144294525">https://www.facebook.com/sheriffvillanueva33/videos/645529144294525</a>
November 8, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/630866152588486">https://www.facebook.com/sheriffvillanueva33/videos/630866152588486</a>
November 29, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/701902668711126">https://www.facebook.com/sheriffvillanueva33/videos/701902668711126</a>
December 6, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1326962862034633">https://www.facebook.com/sheriffvillanueva33/videos/1326962862034633</a>
December 13, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1835338860232618">https://www.facebook.com/sheriffvillanueva33/videos/1835338860232618</a>
December 20, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1045330763182709">https://www.facebook.com/sheriffvillanueva33/videos/1045330763182709</a>
December 27, 2023	<a href="https://www.facebook.com/sheriffvillanueva33/videos/716686013777597">https://www.facebook.com/sheriffvillanueva33/videos/716686013777597</a>
January 3, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/748038136752435">https://www.facebook.com/sheriffvillanueva33/videos/748038136752435</a>
January 11, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1427403044524351">https://www.facebook.com/sheriffvillanueva33/videos/1427403044524351</a>
January 17, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/333810862858485">https://www.facebook.com/sheriffvillanueva33/videos/333810862858485</a>
January 26, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/364947409502973">https://www.facebook.com/sheriffvillanueva33/videos/364947409502973</a>

# EXHIBIT 62

## **Weekly Radio Show**

May 8, 2023	<a href="https://rumble.com/v2mqqs4-the-resistance-w-sheriff-alex-villanueva-first-broadcast-5-8-23.html?e9s=src_v1_ucp">https://rumble.com/v2mqqs4-the-resistance-w-sheriff-alex-villanueva-first-broadcast-5-8-23.html?e9s=src_v1_ucp</a>
May 9, 2023	<a href="https://rumble.com/v2n3ix0-the-resistance-w-sheriff-alex-villanueva-5-9-23.html?e9s=src_v1_ucp">https://rumble.com/v2n3ix0-the-resistance-w-sheriff-alex-villanueva-5-9-23.html?e9s=src_v1_ucp</a>
May 10, 2023	<a href="https://rumble.com/v2n3kmi-the-resistance-w-sheriff-alex-villanueva-5-10-23.html?e9s=src_v1_ucp">https://rumble.com/v2n3kmi-the-resistance-w-sheriff-alex-villanueva-5-10-23.html?e9s=src_v1_ucp</a>
May 11, 2023	<a href="https://rumble.com/v2nagko-the-resistance-with-alex-villanueva.html?e9s=src_v1_ucp">https://rumble.com/v2nagko-the-resistance-with-alex-villanueva.html?e9s=src_v1_ucp</a>
May 12, 2023	<a href="https://rumble.com/v2ngq76-the-resistance-w-sheriff-alex-villanueva-5-12-23.html?e9s=src_v1_ucp">https://rumble.com/v2ngq76-the-resistance-w-sheriff-alex-villanueva-5-12-23.html?e9s=src_v1_ucp</a>
May 15, 2023	<a href="https://rumble.com/v2nyg5y-the-resistance-w-sheriff-alex-villanueva-5-15-23.html?e9s=src_v1_ucp">https://rumble.com/v2nyg5y-the-resistance-w-sheriff-alex-villanueva-5-15-23.html?e9s=src_v1_ucp</a>
May 17, 2023	<a href="https://rumble.com/v2oc2fc-the-resistance-w-sheriff-alex-villanueva-5-17-23.html?e9s=src_v1_ucp">https://rumble.com/v2oc2fc-the-resistance-w-sheriff-alex-villanueva-5-17-23.html?e9s=src_v1_ucp</a>
May 17, 2023	<a href="https://rumble.com/v2oimem-the-resistance-w-sheriff-alex-villanueva-5-17-23.html?e9s=src_v1_ucp">https://rumble.com/v2oimem-the-resistance-w-sheriff-alex-villanueva-5-17-23.html?e9s=src_v1_ucp</a>
May 19, 2023	<a href="https://rumble.com/v2or9zw-the-resistance-w-sheriff-alex-villanueva-5-19-23.html?e9s=src_v1_ucp">https://rumble.com/v2or9zw-the-resistance-w-sheriff-alex-villanueva-5-19-23.html?e9s=src_v1_ucp</a>
May 22, 2023	<a href="https://rumble.com/v2pcmdk-the-resistance-w-sheriff-alex-villanueva-5-22-23.html?e9s=src_v1_ucp">https://rumble.com/v2pcmdk-the-resistance-w-sheriff-alex-villanueva-5-22-23.html?e9s=src_v1_ucp</a>
May 24, 2023	<a href="https://rumble.com/v2pryyy-the-resistance-w-sheriff-alex-villanueva-5-24-23.html?e9s=src_v1_ucp">https://rumble.com/v2pryyy-the-resistance-w-sheriff-alex-villanueva-5-24-23.html?e9s=src_v1_ucp</a>
May 30, 2023	<a href="https://rumble.com/v2r0654-the-resistance-w-sheriff-alex-villanueva-5-30-23.html?e9s=src_v1_ucp">https://rumble.com/v2r0654-the-resistance-w-sheriff-alex-villanueva-5-30-23.html?e9s=src_v1_ucp</a>
May 31, 2023	<a href="https://rumble.com/v2r7ucl-the-resistance-w-sheriff-alex-villanueva-5-31-23.html?e9s=src_v1_ucp">https://rumble.com/v2r7ucl-the-resistance-w-sheriff-alex-villanueva-5-31-23.html?e9s=src_v1_ucp</a>
June 1, 2023	<a href="https://rumble.com/v2rf30w-the-resistance-w-sheriff-alex-villanueva-6-1-23.html?e9s=src_v1_ucp">https://rumble.com/v2rf30w-the-resistance-w-sheriff-alex-villanueva-6-1-23.html?e9s=src_v1_ucp</a>
June 2, 2023	<a href="https://rumble.com/v2rn7b4-the-resistance-w-sheriff-alex-villanueva-6-2-23.html?e9s=src_v1_ucp">https://rumble.com/v2rn7b4-the-resistance-w-sheriff-alex-villanueva-6-2-23.html?e9s=src_v1_ucp</a>
June 5, 2023	<a href="https://rumble.com/v2s9uvu-the-resistance-w-sheriff-alex-villanueva-6-5-23.html?e9s=src_v1_ucp">https://rumble.com/v2s9uvu-the-resistance-w-sheriff-alex-villanueva-6-5-23.html?e9s=src_v1_ucp</a>
June 6, 2023	<a href="https://rumble.com/v2shu4q-the-resistance-w-sheriff-alex-villanueva-6-6-23.html?e9s=src_v1_ucp">https://rumble.com/v2shu4q-the-resistance-w-sheriff-alex-villanueva-6-6-23.html?e9s=src_v1_ucp</a>
June 8, 2023	<a href="https://rumble.com/v2sy3aw-the-resistance-w-sheriff-alex-villanueva-6-8-23.html?e9s=src_v1_ucp">https://rumble.com/v2sy3aw-the-resistance-w-sheriff-alex-villanueva-6-8-23.html?e9s=src_v1_ucp</a>
June 9, 2023	<a href="https://rumble.com/v2t5cwm-the-resistance-w-sheriff-alex-villanueva-6-9-23.html?e9s=src_v1_ucp">https://rumble.com/v2t5cwm-the-resistance-w-sheriff-alex-villanueva-6-9-23.html?e9s=src_v1_ucp</a>
June 12, 2023	<a href="https://rumble.com/v2trvky-the-resistance-w-sheriff-alex-villanueva-6-12-23.html?e9s=src_v1_ucp">https://rumble.com/v2trvky-the-resistance-w-sheriff-alex-villanueva-6-12-23.html?e9s=src_v1_ucp</a>
June 13, 2023	<a href="https://rumble.com/v2tzn6c-the-resistance-w-sheriff-alex-villanueva-6-13-23.html?e9s=src_v1_ucp">https://rumble.com/v2tzn6c-the-resistance-w-sheriff-alex-villanueva-6-13-23.html?e9s=src_v1_ucp</a>

June 14, 2023	<a href="https://rumble.com/v2u79p0-the-resistance-w-sheriff-alex-villanueva-6-14-23.html?e9s=src_v1_ucp">https://rumble.com/v2u79p0-the-resistance-w-sheriff-alex-villanueva-6-14-23.html?e9s=src_v1_ucp</a>
June 15, 2023	<a href="https://rumble.com/v2uewci-the-resistance-w-sheriff-alex-villanueva-6-15-23.html?e9s=src_v1_ucp">https://rumble.com/v2uewci-the-resistance-w-sheriff-alex-villanueva-6-15-23.html?e9s=src_v1_ucp</a>
June 16, 2023	<a href="https://rumble.com/v2umdse-the-resistance-w-sheriff-alex-villanueva-6-16-23.html?e9s=src_v1_ucp">https://rumble.com/v2umdse-the-resistance-w-sheriff-alex-villanueva-6-16-23.html?e9s=src_v1_ucp</a>
June 19, 2023	<a href="https://rumble.com/v2v6rrz-the-resistance-w-sheriff-alex-villanueva-6-19-23.html?e9s=src_v1_ucp">https://rumble.com/v2v6rrz-the-resistance-w-sheriff-alex-villanueva-6-19-23.html?e9s=src_v1_ucp</a>
June 20, 2023	<a href="https://rumble.com/v2vdhyh-the-resistance-w-sheriff-alex-villanueva-6-20-23.html?e9s=src_v1_ucp">https://rumble.com/v2vdhyh-the-resistance-w-sheriff-alex-villanueva-6-20-23.html?e9s=src_v1_ucp</a>
June 21, 2023	<a href="https://rumble.com/v2vk7wa-the-resistance-w-sheriff-alex-villanueva-6-21-23.html?e9s=src_v1_ucp">https://rumble.com/v2vk7wa-the-resistance-w-sheriff-alex-villanueva-6-21-23.html?e9s=src_v1_ucp</a>
June 26, 2023	<a href="https://rumble.com/v2whov2-the-resistance-w-sheriff-alex-villanueva-6-26-23.html?e9s=src_v1_ucp">https://rumble.com/v2whov2-the-resistance-w-sheriff-alex-villanueva-6-26-23.html?e9s=src_v1_ucp</a>
June 28, 2023	<a href="https://rumble.com/v2wv0vm-the-resistance-w-sheriff-alex-villanueva-6-28-23.html?e9s=src_v1_ucp">https://rumble.com/v2wv0vm-the-resistance-w-sheriff-alex-villanueva-6-28-23.html?e9s=src_v1_ucp</a>
July 6, 2023	<a href="https://rumble.com/v2yiooc-the-resistance-w-sheriff-alex-villanueva-7-6-23.html?e9s=src_v1_ucp">https://rumble.com/v2yiooc-the-resistance-w-sheriff-alex-villanueva-7-6-23.html?e9s=src_v1_ucp</a>
July 7, 2023	<a href="https://rumble.com/v2yoyoa-the-resistance-w-sheriff-alex-villanueva-7-7-23.html?e9s=src_v1_ucp">https://rumble.com/v2yoyoa-the-resistance-w-sheriff-alex-villanueva-7-7-23.html?e9s=src_v1_ucp</a>
July 10, 2023	<a href="https://rumble.com/v2z941s-the-resistance-w-sheriff-alex-villanueva-7-10-23.html?e9s=src_v1_ucp">https://rumble.com/v2z941s-the-resistance-w-sheriff-alex-villanueva-7-10-23.html?e9s=src_v1_ucp</a>
July 11, 2023	<a href="https://rumble.com/v2zfwv6-the-resistance-w-sheriff-alex-villanueva-7-11-23.html?e9s=src_v1_ucp">https://rumble.com/v2zfwv6-the-resistance-w-sheriff-alex-villanueva-7-11-23.html?e9s=src_v1_ucp</a>
July 14, 2023	<a href="https://rumble.com/v300ypa-the-resistance-w-sheriff-alex-villanueva-7-14-23.html?e9s=src_v1_ucp">https://rumble.com/v300ypa-the-resistance-w-sheriff-alex-villanueva-7-14-23.html?e9s=src_v1_ucp</a>
July 17, 2023	<a href="https://rumble.com/v30l60e-the-resistance-w-sheriff-alex-villanueva-7-17-23.html?e9s=src_v1_ucp">https://rumble.com/v30l60e-the-resistance-w-sheriff-alex-villanueva-7-17-23.html?e9s=src_v1_ucp</a>
July 18, 2023	<a href="https://rumble.com/v30sah0-the-resistance-w-sheriff-alex-villanueva-7-18-23.html?e9s=src_v1_ucp">https://rumble.com/v30sah0-the-resistance-w-sheriff-alex-villanueva-7-18-23.html?e9s=src_v1_ucp</a>
July 19, 2023	<a href="https://rumble.com/v30zs5m-the-resistance-w-sheriff-alex-villanueva-7-19-23.html?e9s=src_v1_ucp">https://rumble.com/v30zs5m-the-resistance-w-sheriff-alex-villanueva-7-19-23.html?e9s=src_v1_ucp</a>
July 24, 2023	<a href="https://rumble.com/v32396s-the-resistance-w-sheriff-alex-villanueva-7-24-23.html?e9s=src_v1_ucp">https://rumble.com/v32396s-the-resistance-w-sheriff-alex-villanueva-7-24-23.html?e9s=src_v1_ucp</a>
July 25, 2023	<a href="https://rumble.com/v32bdjc-the-resistance-w-sheriff-alex-villanueva-7-25-23.html?e9s=src_v1_ucp">https://rumble.com/v32bdjc-the-resistance-w-sheriff-alex-villanueva-7-25-23.html?e9s=src_v1_ucp</a>
July 26, 2023	<a href="https://rumble.com/v32j562-the-resistance-w-sheriff-alex-villanueva-7-26-23.html?e9s=src_v1_ucp">https://rumble.com/v32j562-the-resistance-w-sheriff-alex-villanueva-7-26-23.html?e9s=src_v1_ucp</a>
July 27, 2023	<a href="https://rumble.com/v32qou2-the-resistance-w-sheriff-villanueva-7-27-23.html?e9s=src_v1_ucp">https://rumble.com/v32qou2-the-resistance-w-sheriff-villanueva-7-27-23.html?e9s=src_v1_ucp</a>
July 28, 2023	<a href="https://rumble.com/v32yqls-the-resistance-w-sheriff-alex-villanueva-7-28-23.html?e9s=src_v1_ucp">https://rumble.com/v32yqls-the-resistance-w-sheriff-alex-villanueva-7-28-23.html?e9s=src_v1_ucp</a>
July 31, 2023	<a href="https://rumble.com/v33nz61-the-resistance-w-sheriff-alex-villanueva-7-31-23.html?e9s=src_v1_ucp">https://rumble.com/v33nz61-the-resistance-w-sheriff-alex-villanueva-7-31-23.html?e9s=src_v1_ucp</a>
August 1, 2023	<a href="https://rumble.com/v33w61x-the-resistance-w-sheriff-alex-villanueva-8-1-23.html?e9s=src_v1_ucp">https://rumble.com/v33w61x-the-resistance-w-sheriff-alex-villanueva-8-1-23.html?e9s=src_v1_ucp</a>



August 2, 2023	<a href="https://rumble.com/v345ud3-the-resistance-w-sheriff-alex-villanueva-8-2-23.html?e9s=src_v1_ucp">https://rumble.com/v345ud3-the-resistance-w-sheriff-alex-villanueva-8-2-23.html?e9s=src_v1_ucp</a>
August 4, 2023	<a href="https://rumble.com/v34pdp2-the-resistance-w-sheriff-alex-villanueva-8-4-23.html?e9s=src_v1_ucp">https://rumble.com/v34pdp2-the-resistance-w-sheriff-alex-villanueva-8-4-23.html?e9s=src_v1_ucp</a>
	<a href="https://rumble.com/v35i0dq-the-resistance-w-sheriff-alex-villanueva.html?e9s=src_v1_ucp">https://rumble.com/v35i0dq-the-resistance-w-sheriff-alex-villanueva.html?e9s=src_v1_ucp</a>
August 8, 2023	<a href="https://rumble.com/v35qmc6-the-resistance-w-sheriff-alex-villanueva-8-8-23.html?e9s=src_v1_ucp">https://rumble.com/v35qmc6-the-resistance-w-sheriff-alex-villanueva-8-8-23.html?e9s=src_v1_ucp</a>
August 9, 2023	<a href="https://rumble.com/v3604vs-the-resistance-w-alex-villanueva-8-9-23.html?e9s=src_v1_ucp">https://rumble.com/v3604vs-the-resistance-w-alex-villanueva-8-9-23.html?e9s=src_v1_ucp</a>
August 10, 2023	<a href="https://rumble.com/v36a3pl-the-resistance-w-sheriff-alex-villanueva-8-10-23.html?e9s=src_v1_ucp">https://rumble.com/v36a3pl-the-resistance-w-sheriff-alex-villanueva-8-10-23.html?e9s=src_v1_ucp</a>
August 11, 2023	<a href="https://rumble.com/v36lrxu-the-resistance-w-alex-villanueva-8-11-23.html?e9s=src_v1_ucp">https://rumble.com/v36lrxu-the-resistance-w-alex-villanueva-8-11-23.html?e9s=src_v1_ucp</a>
August 14, 2023	<a href="https://rumble.com/v37ixqk-the-resistance-w-alex-villanueva-8-14-23.html?e9s=src_v1_ucp">https://rumble.com/v37ixqk-the-resistance-w-alex-villanueva-8-14-23.html?e9s=src_v1_ucp</a>
August 15, 2023	<a href="https://rumble.com/v37wy32-the-resistance-w-sheriff-alex-villanueva-8-15-23.html?e9s=src_v1_ucp">https://rumble.com/v37wy32-the-resistance-w-sheriff-alex-villanueva-8-15-23.html?e9s=src_v1_ucp</a>
August 2023	<a href="https://rumble.com/v38x6ts-the-resistance-w-sheriff-alex-villanueva.html?e9s=src_v1_ucp">https://rumble.com/v38x6ts-the-resistance-w-sheriff-alex-villanueva.html?e9s=src_v1_ucp</a>
August 22, 2023	<a href="https://rumble.com/v3aisw2-the-resistance-w-sheriff-alex-villanueva-8-22-23.html?e9s=src_v1_ucp">https://rumble.com/v3aisw2-the-resistance-w-sheriff-alex-villanueva-8-22-23.html?e9s=src_v1_ucp</a>
August 23, 2023	<a href="https://rumble.com/v3awxkn-the-resistance-w-sheriff-alex-villanueva-8-23-23.html?e9s=src_v1_ucp">https://rumble.com/v3awxkn-the-resistance-w-sheriff-alex-villanueva-8-23-23.html?e9s=src_v1_ucp</a>
August 17, 2023	<a href="https://rumble.com/v38k6jg-the-resistance-w-sheriff-alex-villanueva-8-17-23.html?e9s=src_v1_ucp">https://rumble.com/v38k6jg-the-resistance-w-sheriff-alex-villanueva-8-17-23.html?e9s=src_v1_ucp</a>
August 29, 2023	<a href="https://rumble.com/v3d0vht-the-resistance-w-sheriff-alex-villanueva-8-29-23.html?e9s=src_v1_ucp">https://rumble.com/v3d0vht-the-resistance-w-sheriff-alex-villanueva-8-29-23.html?e9s=src_v1_ucp</a>
August 30, 2023	<a href="https://rumble.com/v3dfvwy-the-resistance-w-sheriff-alex-villanueva-8-30-23.html?e9s=src_v1_ucp">https://rumble.com/v3dfvwy-the-resistance-w-sheriff-alex-villanueva-8-30-23.html?e9s=src_v1_ucp</a>
September 5, 2023	<a href="https://rumble.com/v3f37o5-the-resistance-with-alex-villanueva-9-5-23.html?e9s=src_v1_ucp">https://rumble.com/v3f37o5-the-resistance-with-alex-villanueva-9-5-23.html?e9s=src_v1_ucp</a>
September 2023	<a href="https://rumble.com/v3fqnkx-the-resistance-with-sheriff-alex-villanueva.html?e9s=src_v1_ucp">https://rumble.com/v3fqnkx-the-resistance-with-sheriff-alex-villanueva.html?e9s=src_v1_ucp</a>
September 2023	<a href="https://rumble.com/v3fr397-the-resistance-with-sheriff-alex-villanueva.html?e9s=src_v1_ucp">https://rumble.com/v3fr397-the-resistance-with-sheriff-alex-villanueva.html?e9s=src_v1_ucp</a>
September 2023	<a href="https://rumble.com/v3glav3-the-resistance-with-sheriff-alex-villanueva.html?e9s=src_v1_ucp">https://rumble.com/v3glav3-the-resistance-with-sheriff-alex-villanueva.html?e9s=src_v1_ucp</a>

# EXHIBIT 63

**From:** Blakinger, Keri  
**Sent:** Thursday, November 2, 2023 7:49 AM PDT  
**To:** Discovery Unit PRA Requests  
**Subject:** records request - cpoe

---

This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments

---

Hi,  
I'm reaching out because I'd like to make a public records request. PC 832.7 b1d makes public any sustained finding that a peace officer discriminated based on race. I would like any findings regarding allegations that former sheriff Alex Villanueva discriminated against either Max Huntsman or Esther Lim, if such findings exist likely from a CPOE probe.  
Thank you,  
Keri Blakinger

**COLA003378**

# EXHIBIT 64



# OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ROBERT G. LUNA, SHERIFF



December 22, 2023

Keri Blakinger  
Los Angeles Times  
Keri.blakinger@latimes.com

Dear Ms. Blakinger:

## **PUBLIC RECORDS ACT REQUEST #23-14684SE**

This is a follow-up to our letter dated November 30, 2023, in response to your request for records under the California Public Records Act (CPRA) dated and received by the Los Angeles County Sheriff's Department (LASD), Public Records Act Unit, on November 2, 2023.

In your request, you are seeking the following:

I would like any findings regarding allegations that former sheriff Alex Villanueva discriminated against either Max Huntsman or Esther Lim, if such findings exist likely from a CPOE probe.

**Response:** We are providing some non-exempt records disclosable under Penal Code section 832.7 for former sheriff Alex Villanueva because the Sheriff's Department interprets your request to seek these records. Portions of these records are withheld or redacted under, but not limited to, the following authorities: California Constitution, article 1, section 1; attorney-client privilege; attorney work-product doctrine codified as California Code of Civil Procedure section 2018.010, et seq.; deliberative process privilege; Evidence Code section 1040; and Government Code sections 7927.700, 7927.200, 7923.600-7923.625, 7927.705, and 7922.000.

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1850 —

COLA003383

EXHIBIT 64 - Page 963

Keri Blakinger  
PRA #23-14684SE

-2-

December 22, 2023

Specifically, it is undisputed that under California law, the people's right of access is not absolute. (*Humane Society of U.S. v. Superior Court* (2013) 214 Cal.App.4th 1233, 1254.) Government Code section 7927.705 exempts from disclosure "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or State law, including but not limited to, provisions of the Evidence Code relating to privilege." That exemption incorporates other prohibitions established by law. (*County of Los Angeles v. Superior Court* (2015) 242 Cal.App.4th 475, 482.) One such law is the attorney-client privilege, codified as California Evidence Code section 950, et seq. Subject to specified exceptions and waiver, inapplicable here, a client "has a privilege to refuse to disclose, and to prevent another from disclosing a confidential communication between client and lawyer . . . ." (Evid. Code § 954.) Accordingly, portions of the requested records are withheld as attorney-client privileged communications.

In addition, portions of the records you requested are exempt from disclosure because they enjoy the protection of the attorney work-product doctrine, codified in California Code of Civil Procedure section 2018.010 et seq. The protection provided by the work-product doctrine applies to writings prepared by an attorney, whether or not prepared in anticipation of a lawsuit. (*State Comp. Ins. Fund v. Superior Court* (2001) 91 Cal.App.4th 1080, 1091.)

Moreover, portions of the records you requested are protected under the official information privilege, as set forth in Evidence Code section 1040, and the "catchall exception," as set forth in Government Code section 7922.000. Under Evidence Code section 1040, "official information means information acquired in confidence by a public employee in the course of his or her duty . . . ." (Evid. Code, § 1040, subd. (a).) "A public entity has a privilege to refuse to disclose official information" if "(1) [d]isclosure is forbidden by . . . a statute of this state[] or (2) [d]isclosure of the information is against the public interest because there is a necessity for preserving the confidentiality of the information that outweighs the necessity for disclosure in the interest of justice . . . ." (*Id.*, § 1040, subd. (b).) Government Code section 7922.000, in turn, allows a government agency to withhold records if the public interest served by withholding the records clearly outweighs the public interest served by disclosure. (Gov. Code, § 7922.000.) The weighing process articulated by both sections is the same. (*American Civil Liberties Union of Northern California v. Superior Court* (2011) 202 Cal.App.4th 55, 69.)

Finally, the deliberative process privilege is intended to address concerns that open discussion of policy matters might be impeded if subject to public scrutiny. (*Id.*) It espouses the idea that access to across-the-board opinions and the ability to seek all points of view, and to discuss policies in confidence, are crucial to effective governance in a representative democracy. (*Id.*)

Keri Blakinger  
PRA #23-14684SE

-3-

December 22, 2023

We are in the process of reviewing additional potentially responsive documents and will supplement our response with any non-exempt and non-privileged documents. We anticipate having additional information on or before January 6, 2024. Please note that the Sheriff's Department reserves its right to assert all other applicable exemptions, privileges, and doctrines.

If you have any questions, please contact the Public Records Act Unit via email at [DiscoveryUnitPRArequests@lasd.org](mailto:DiscoveryUnitPRArequests@lasd.org) or phone (323) 890-5050.

Sincerely,

ROBERT G. LUNA, SHERIFF

A handwritten signature in black ink, appearing to read "Shawnee N. Hinchman", followed by the initials "JNA" in a smaller, less legible script.

Shawnee N. Hinchman, Captain  
Risk Management Bureau

# EXHIBIT 65



## **Facebook Live Sessions January 31, 2024 - Present**

January 31, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/406309411851101">https://www.facebook.com/sheriffvillanueva33/videos/406309411851101</a>
February 7, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/411725888048923">https://www.facebook.com/sheriffvillanueva33/videos/411725888048923</a>
February 14, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1561086168009198">https://www.facebook.com/sheriffvillanueva33/videos/1561086168009198</a>
February 21, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/340547728303848">https://www.facebook.com/sheriffvillanueva33/videos/340547728303848</a>
February 28, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/3458352831121589">https://www.facebook.com/sheriffvillanueva33/videos/3458352831121589</a>
March 7, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/942674883626181">https://www.facebook.com/sheriffvillanueva33/videos/942674883626181</a>
March 13, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/328746863040635">https://www.facebook.com/sheriffvillanueva33/videos/328746863040635</a>
March 27, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/380102894858523">https://www.facebook.com/sheriffvillanueva33/videos/380102894858523</a>
April 3, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1602064960545816">https://www.facebook.com/sheriffvillanueva33/videos/1602064960545816</a>
April 10, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/935823311536771/">https://www.facebook.com/sheriffvillanueva33/videos/935823311536771/</a>
April 17, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/395537683245461/">https://www.facebook.com/sheriffvillanueva33/videos/395537683245461/</a>
April 24, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1144032383398847/">https://www.facebook.com/sheriffvillanueva33/videos/1144032383398847/</a>
May 1, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1144032383398847/">https://www.facebook.com/sheriffvillanueva33/videos/1144032383398847/</a>
May 8, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/6233350383456745">https://www.facebook.com/sheriffvillanueva33/videos/6233350383456745</a>
May 15, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1757417781452086">https://www.facebook.com/sheriffvillanueva33/videos/1757417781452086</a>
May 22, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1757417781452086">https://www.facebook.com/sheriffvillanueva33/videos/1757417781452086</a>
May 29, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/303970156119084">https://www.facebook.com/sheriffvillanueva33/videos/303970156119084</a>
June 5, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/444629098284264">https://www.facebook.com/sheriffvillanueva33/videos/444629098284264</a>
June 12, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/334934596142610">https://www.facebook.com/sheriffvillanueva33/videos/334934596142610</a>
June 19, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/8153943321297089">https://www.facebook.com/sheriffvillanueva33/videos/8153943321297089</a>
June 26, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/478941694726993">https://www.facebook.com/sheriffvillanueva33/videos/478941694726993</a>
July 3, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1257020505676871">https://www.facebook.com/sheriffvillanueva33/videos/1257020505676871</a>
August 14, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/378009935322674/">https://www.facebook.com/sheriffvillanueva33/videos/378009935322674/</a>
August 21, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/2775083072640317">https://www.facebook.com/sheriffvillanueva33/videos/2775083072640317</a>
August 24, 2024	<a href="https://www.facebook.com/watch/?v=898291715480498">https://www.facebook.com/watch/?v=898291715480498</a>
August 28, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/495193840131937">https://www.facebook.com/sheriffvillanueva33/videos/495193840131937</a>
September 4, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1026045518827714">https://www.facebook.com/sheriffvillanueva33/videos/1026045518827714</a>
September 11, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/411114374946343">https://www.facebook.com/sheriffvillanueva33/videos/411114374946343</a>
September 18, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/3721083021485661">https://www.facebook.com/sheriffvillanueva33/videos/3721083021485661</a>
September 25, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/527396439907492">https://www.facebook.com/sheriffvillanueva33/videos/527396439907492</a>
October 2, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1177980293264978/">https://www.facebook.com/sheriffvillanueva33/videos/1177980293264978/</a>
October 15, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1679087642942896">https://www.facebook.com/sheriffvillanueva33/videos/1679087642942896</a>
October 23, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/3863424720565524">https://www.facebook.com/sheriffvillanueva33/videos/3863424720565524</a>
November 6, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1091995759216109">https://www.facebook.com/sheriffvillanueva33/videos/1091995759216109</a>
November 13, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/536360972638462">https://www.facebook.com/sheriffvillanueva33/videos/536360972638462</a>
November 20, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/2715055342216552">https://www.facebook.com/sheriffvillanueva33/videos/2715055342216552</a>
December 4, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1112066037287729">https://www.facebook.com/sheriffvillanueva33/videos/1112066037287729</a>

December 12, 2024	<a href="https://www.facebook.com/sheriffvillanueva33/videos/961257655866684">https://www.facebook.com/sheriffvillanueva33/videos/961257655866684</a>
January 1, 2025	<a href="https://www.facebook.com/watch/?v=1643004632982005">https://www.facebook.com/watch/?v=1643004632982005</a>
January 8, 2025	<a href="https://www.facebook.com/sheriffvillanueva33/videos/988167379792190">https://www.facebook.com/sheriffvillanueva33/videos/988167379792190</a>
January 15, 2025	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1830029507767543">https://www.facebook.com/sheriffvillanueva33/videos/1830029507767543</a>
January 22, 2025	<a href="https://www.facebook.com/sheriffvillanueva33/videos/956557036619181">https://www.facebook.com/sheriffvillanueva33/videos/956557036619181</a>
January 29, 2025	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1794206027787746">https://www.facebook.com/sheriffvillanueva33/videos/1794206027787746</a>
February 5, 2025	<a href="https://www.facebook.com/watch/?v=2008747369609339">https://www.facebook.com/watch/?v=2008747369609339</a>
February 12, 2025	<a href="https://www.facebook.com/watch?v=663560756000168">https://www.facebook.com/watch?v=663560756000168</a>
February 26, 2025	<a href="https://www.facebook.com/watch?v=1807614110084925">https://www.facebook.com/watch?v=1807614110084925</a>
March 5, 2025	<a href="https://www.facebook.com/watch?v=1345078196778950">https://www.facebook.com/watch?v=1345078196778950</a>
April 2, 2025	<a href="https://www.facebook.com/sheriffvillanueva33/videos/2922724437908607">https://www.facebook.com/sheriffvillanueva33/videos/2922724437908607</a>
April 9, 2025	<a href="https://www.facebook.com/sheriffvillanueva33/videos/566347125896871">https://www.facebook.com/sheriffvillanueva33/videos/566347125896871</a>
April 16, 2025	<a href="https://www.facebook.com/sheriffvillanueva33/videos/1015713853865338">https://www.facebook.com/sheriffvillanueva33/videos/1015713853865338</a>

# **EXHIBIT 66**

**(SEPARATELY LODGED WITH COURT)**

# **EXHIBIT 67**

**(SEPARATELY LODGED WITH COURT)**

# **EXHIBIT 68**

**(SEPARATELY LODGED WITH COURT)**

# **EXHIBIT 69**

**(SEPARATELY LODGED WITH COURT)**

# EXHIBIT 70







# EXHIBIT 71



# EXHIBIT 72

4/18/25, 8:34 AM

Max Huntsman # 156780 - Attorney Licensee Search



## The State Bar of California

**Max Huntsman #156780****License Status: Active**




Address: L.A. County Office of Inspector General, 312 S Hill St Fl 3, Los Angeles, CA 90013-1109

Phone: 213-974-6100 | Fax: Not Available

Email: [mhuntsman@oig.lacounty.gov](mailto:mhuntsman@oig.lacounty.gov) | Website: [www.oig.lacounty.gov](http://www.oig.lacounty.gov)

### More about This Attorney ▼

**All changes of license status due to nondisciplinary administrative matters and disciplinary actions.**

Date	License Status 	Discipline 	Administrative Action 
Present	Active		
12/16/1991	Admitted to the State Bar of California		

**Additional Information:**

- **About the disciplinary system**

Copyright © 2025 The State Bar of California





# EXHIBIT 73

**OFFICE OF THE SHERIFF****COUNTY OF LOS ANGELES****HALL OF JUSTICE**

ROBERT G. LUNA, SHERIFF



October 23, 2023

IAB File # IV 2558097

Mr. [REDACTED]  
500 W. Temple Street  
Los Angeles, California 90013

Dear Mr. [REDACTED]:

**NOTIFICATION LETTER**

On or about March 16, 2022, a Policy of Equality (POE) Complaint was filed on your behalf with the LASD Intake Specialist Unit, wherein you complained about workplace matters. As required by California Penal Code Section 832.7 (e)(1), "the department or agency shall provide written notification to the complaining party of the disposition of the complaint within 30 days of the disposition." This letter serves to satisfy such requirement.

Your complaint against Former Sheriff Alex Villanueva was investigated by the LASD's Equity Investigations Unit (EIU). Upon completing the investigation, the EIU forwarded the case to the County Equity Oversight Panel (CEOP). On October 17, 2023, the CEOP met to render its finding.

Upon consideration of the facts developed in the investigation, the Panel's recommended finding is as follows:

As to Alex Villanueva the panel determined that a violation of the Department's Policy of Equality occurred, and appropriate administrative action will be taken.

No other violations of the Department's policies and procedures were found.

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1850 —

COLA003485

EXHIBIT 73 - Page 980

Mr. [REDACTED]

2

October 23, 2023

You should be aware that Alex Villanueva has the right to grieve and/or otherwise appeal this recommended determination.

You should also be aware that, "the notification described in this subdivision shall not be conclusive or binding or admissible as evidence in any separate or subsequent action or proceeding brought before an arbitrator, court, or judge of this state or the United States," California Penal Code Section 832.7(e)(2).

Sincerely,

ROBERT G. LUNA, SHERIFF

***ORIGINAL SIGNED***

Ron Kopperud, Captain  
Internal Affairs Bureau

# EXHIBIT 74



**OFFICE OF THE SHERIFF****COUNTY OF LOS ANGELES****HALL OF JUSTICE**

ROBERT G. LUNA, SHERIFF



October 23, 2023

IAB File # IV 2558101

Ms. [REDACTED]  
450 Bauchet Street  
Los Angeles, California 90012

Dear Ms. [REDACTED]:

**NOTIFICATION LETTER**

On or about March 17, 2022, a Policy of Equality (POE) Complaint was filed on your behalf with the LASD Intake Specialist Unit, wherein you complained about workplace matters. As required by California Penal Code Section 832.7 (e)(1), "the department or agency shall provide written notification to the complaining party of the disposition of the complaint within 30 days of the disposition." This letter serves to satisfy such requirement.

Your complaint against Former Sheriff Alex Villanueva was investigated by the LASD's Equity Investigations Unit (EIU). Upon completing the investigation, the EIU forwarded the case to the County Equity Oversight Panel (CEOP). On October 17, 2023, the CEOP met to render its finding.

Upon consideration of the facts developed in the investigation, the Panel's recommended finding is as follows:

As to Alex Villanueva the panel determined that a violation of the Department's Policy of Equality occurred, and appropriate administrative action will be taken.

No other violations of the Department's policies and procedures were found.

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1850 —

Mr. [REDACTED]

2

October 23, 2023

You should be aware that Alex Villanueva has the right to grieve and/or otherwise appeal this recommended determination.

You should also be aware that, "the notification described in this subdivision shall not be conclusive or binding or admissible as evidence in any separate or subsequent action or proceeding brought before an arbitrator, court, or judge of this state or the United States," California Penal Code Section 832.7(e)(2).

Sincerely,

ROBERT G. LUNA, SHERIFF

***ORIGINAL SIGNED***

Ron Kopperud, Captain  
Internal Affairs Bureau

COLA003476

EXHIBIT 74 - Page 984

# EXHIBIT 75

**CERTIFIED COPY**

1605 W. Olympic Blvd., Suite 800 Los Angeles, CA 90015

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ALEX VILLANUEVA vs OF LOS ANGELES SHERIFF'S EQUITY OVERSIGHT PANEL

SERGIO ESCOBEDO

March 14, 2025

1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

3

4 ALEX VILLANUEVA, )  
5 Plaintiff, )  
6 )  
7 VS. ) Case No.: 2:24-cv-04979  
SVW (JCx)

8 COUNTY OF LOS ANGELES, COUNTY )  
OF LOS ANGELES SHERIFFS )  
9 DEPARTMENT, LOS ANGELES COUNTY )  
BOARD OF SUPERVISORS, COUNTY )  
10 EQUITY OVERSIGHT PANEL, LOS )  
ANGELES COUNTY OFFICE OF )  
11 INSPECTOR GENERAL, CONSTANCE )  
KOMOROSKI, MERCEDES CRUZ, )  
12 ROBERTA YANG, LAURA LECRIVAIN, )  
SERGIO V. ESCOBEDO, RON )  
13 KOPPERUD, ROBERT G. LUNA, )  
MAX-GUSTAF HUNTSMAN, ESTHER )  
14 LIM, and DOES 1 to 100, )  
inclusive, )  
15 )  
Defendants. )

16 \_\_\_\_\_)

17 ,

18 DEPOSITION OF:  
19 SERGIO V. ESCOBEDO  
20 CONDUCTED VIA VIDEOCONFERENCE  
21 Friday, March 14, 2025

22

23

24 REPORTED BY:  
Kyle Miller  
25 CSR No. 13282

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
2 FOR THE COUNTY OF [!COUNTY]

3

4 ALEX VILLANUEVA, )  
5 Plaintiff, )  
6 VS. ) Case No.: 2:24-cv-04979  
7 ) SVW (JCx)

8 COUNTY OF LOS ANGELES, COUNTY )  
9 OF LOS ANGELES SHERIFFS )  
10 DEPARTMENT, LOS ANGELES COUNTY )  
11 BOARD OF SUPERVISORS, COUNTY )  
12 EQUITY OVERSIGHT PANEL, LOS )  
13 ANGELES COUNTY OFFICE OF )  
14 INSPECTOR GENERAL, CONSTANCE )  
15 KOMOROSKI, MERCEDES CRUZ, )  
16 ROBERTA YANG, LAURA LECRIVAIN, )  
17 SERGIO V. ESCOBEDO, RON )  
18 KOPPERUD, ROBERT G. LUNA, )  
19 MAX-GUSTAF HUNTSMAN, ESTHER )  
20 LIM, and DOES 1 to 100, )  
21 inclusive, )  
22 Defendants. )

23

24

25 Deposition of Sergio V. Escobedo, Volume 1, taken  
on behalf of the Plaintiff, before Kyle Miller,  
Certified Shorthand Reporter No. 13282 and Registered  
Professional Reporter for the State of California,  
commencing on Friday, March 14, 2025, via  
videoconference, beginning at 10:06 a.m. and ending at  
2:04 p.m.

1 APPEARANCES OF COUNSEL:

2

3 FOR THE PLAINTIFF:

4 SHEGERIAN & ASSOCIATES, INC.  
By: Alex DiBona, Attorney-at-Law  
5 11520 San Vicente Boulevard  
Los Angeles, California 90049  
6 (310) 860-0770  
adibona@shegerianlaw.com  
7

8 FOR THE DEFENDANTS:

9 MILLER BARONDESS, LLP  
By: Jason H. Tokoro, Attorney-at-Law  
10 Steven Williamson, Attorney-at-Law  
2121 Avenue of the Stars  
11 Suite 2600  
Los Angeles, California 90067  
12 (310) 552-4400  
jtokoro@millerbardondess.com  
13

14 ALSO PRESENT:  
15

Alex Villanueva  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

1 under "Charge Founded," there's an "x"?

2 A. Yes.

3 Q. And are you the one that put that "x"?

4 A. No.

5 Q. Who put that "x"?

6 A. This form, it comes from ISU, which is our  
7 intake services unit. They prepare the form based on  
8 the hearing results, and they provide me that form for  
9 signature, since I am the department liaison between the  
10 county equity oversight panel and the department. So  
11 it's my -- part of my responsibilities to notify the  
12 equity oversight panel of the results, and that is the  
13 purpose of this form.

14 Q. At the hearing itself, did you and  
15 Chief Lecrivain discuss the case at all?

16 A. No.

17 Q. And did Chief Lecrivain, to your  
18 understanding, make the decision to uphold the CEOP  
19 panel's recommendation for a "do not rehire" notation?

20 A. The CEOP made the recommendation, and  
21 Chief Lecrivain concurred with that recommendation.

22 Q. Did Chief Lecrivain tell you why she  
23 concurred?

24 A. No, she did not.

25 Q. And even if she didn't tell you, as you sit



1 EXAMINATION

2

3 BY MR. TOKORO:

4 Q. Commander Escobedo, I want to follow up on  
5 some of the questions you were asked by Mr. DiBona, but  
6 first I want to start with asking you about some  
7 questions about the board of supervisors.

8 Is that okay?

9 A. Yes.

10 Q. Did anyone from the board of supervisors  
11 attend the CEOP prehearing on either of the  
12 investigations into Mr. Villanueva?

13 A. No.

14 Q. Did any of the actual board of supervisors  
15 themselves attend that prehearing?

16 A. No.

17 Q. Did anyone from the board of supervisors  
18 attend the CEOP hearing on the investigations into  
19 Mr. Villanueva?

20 A. No.

21 Q. Did anyone from the board of supervisors  
22 contact you or communicate with you in any way in  
23 connection with the Huntsman or Lim complaints?

24 A. No.

25 Q. Did Sheriff Luna attend the CEOP prehearing

1 on the complaints against Mr. Villanueva?

2 A. No.

3 Q. Did Sheriff Luna attend the CEOP hearing

4 itself on those two complaints?

5 A. No.

6 Q. Did Sheriff Luna communicate with you in any

7 way in connection with the Huntsman complaint?

8 A. No.

9 Q. Did Sheriff Luna communicate with you in any

10 way in connection with the Lim complaint?

11 A. No.

12 Q. Did Sheriff Luna, as far as you know, have

13 any involvement in either investigation?

14 A. No.

15 Q. Now, Mr. Villanueva has claimed that the  
16 investigation and "do not rehire" notation was given to  
17 him in retaliation for his exercise of First Amendment  
18 speech. So I want to talk to you about that. One of  
19 the things that Mr. Villanueva claims is that his public  
20 statements about Measure A were a reason he was  
21 retaliated against by having these investigations done.

22 Was Mr. Villanueva's position on Measure A  
23 any part of the CEOP prehearing or hearing on the  
24 Huntsman or Lim complaints?

25 A. No.

1 Q. Did Measure A have anything to do with the  
2 department's decision in connection with the Huntsman  
3 and Lim complaints?

4 A. No.

5 Q. Now, what about Mr. Villanueva's position on  
6 Measure J? Was that taken into account in either the  
7 CEOP prehearing or hearing?

8 A. No.

9 Q. Did that have anything to do with the outcome  
10 of the Huntsman or Lim complaints?

11 A. No.

12 Q. What about Sheriff Villanueva's --  
13 Mr. Villanueva's position on Measure R? Did that have  
14 anything to do with the CEOP prehearing or hearing?

15 A. No.

16 Q. Did that have anything to do with the outcome  
17 of the complaints filed by Mr. Huntsman or Ms. Lim?

18 A. No.

19 Q. Did that have anything to do with the  
20 department's concurrence with the CEOP's  
21 recommendations?

22 A. No.

23 Q. Did any of these ballot measures come up at  
24 any point in time during the prehearing or the hearing?

25 A. No.

1 Q. Mr. Villanueva also took a position on not  
2 enforcing the vaccine mandate with sworn personnel.

3 Did that position have anything to do with  
4 the CEOP prehearing or hearing?

5 A. No.

6 Q. Did it have anything to do with the Huntsman  
7 or Lim investigations?

8 A. No.

9 Q. Did it have anything to do with the  
10 department's decision or concurrence with the CEOP's  
11 recommendations?

12 A. No.

13 Q. Now, Mr. Villanueva also made public  
14 statements in opposition to a county contract with  
15 Fulgent regarding COVID.

16 Did the Fulgent statements have -- by  
17 Mr. Villanueva have anything to do with the CEOP  
18 prehearing or hearing?

19 A. No.

20 Q. Did it have anything to do with either the  
21 Huntsman or Lim investigations?

22 A. No.

23 Q. Did it have anything to do with the  
24 department's concurrence with the CEOP's  
25 recommendations?

1 A. No.

2 MR. TOKORO: I've got nothing else, Alex.

3 MR. DIBONA: All right. Let me just follow up on  
4 that for a moment.

5

6 FURTHER EXAMINATION

7

8 BY MR. DIBONA:

9 Q. Commander Escobedo, is it true

10 Laura Lecrivain didn't tell you why she concurred in the  
11 CEOP hearing? Correct? Or the CE -- sorry. Let me  
12 rephrase that.

13 It's true Chief Lecrivain did not tell you  
14 why she concurred in the CEOP's recommendation for a "do  
15 not hire" -- "rehire" notation; correct?

16 A. Correct.

17 Q. Then how can you say what the basis of her  
18 concurrence was?

19 A. I'm not understanding that. In what context?

20 Q. When --

21 A. To the memo I signed or --

22 Q. No.

23 When opposing counsel asked you, "Was  
24 Measure A part of the department's concurrence?" how are  
25 you able to answer "no"?

1

2 I, Kyle Miller, CSR No. 13282, certify:

3 That the foregoing proceedings were taken

4 before me at the time and place herein set forth; that

5 prior to testifying, the deponent was placed under oath;

6 that a verbatim record of the proceedings was made by me

7 using machine shorthand which was thereafter transcribed

8 under my direction; further, that the foregoing is an

9 accurate transcription thereof.

10 The deponent's review, correction, and

11 signing of the transcript was requested.

12 The dismantling, unsealing, or unbinding of

13 the original or certified transcript will render the

14 reporter's certificate null and void.

15 I further certify that I am not financially

16 interested in the action and that I am not a relative

17 nor an employee of any attorney or party to this action.

18

19 Dated this 31st day of March, 2025.

20

21

22

23

24

25

---

Kyle Miller  
CSR NO. 13282

ESCOBEDO, SERGIO

Page 150

1 **CASE NAME:** Villanueva vs. County of Los Angeles, et al.


2 **WITNESS NAME:** Sergio V. Escobedo

3 **DATE TAKEN:** Friday, March 14, 2025

4 **TRANSCRIPT ERRATA SHEET**

5 The reasons for making changes to answers are as follows:

- 6 1. To clarify the record;  
7 2. To conform to the facts;  
8 3. To correct major transcription errors.

9	PAGE	LINE	CORRECTION & REASON
10	146	6	"December 2024" not December 1994
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24	 Signature of Deponent		<u>4/2/25</u> Date
25			

# EXHIBIT 76



# ALEX VILLANUEVA

Los Angeles, CA | 562 754-0885 | sheriffvillanueva33@gmail.com |

FEBRUARY 22, 2025

Mr. Gary Peterson  
CEO/President  
Public Sector Search &  
Consulting, Inc.  
6520 Lonetree Blvd.,  
Suite 1040  
Rocklin, CA 95765

DEAR GARY PETERSON

I was pleasantly surprised to learn the position of Chief of Police and Emergency Management for the new Transit Community Public Safety Department was still being held open. I am submitting my cover letter and resume to signal my interest in this unique leadership opportunity.

Launching a new law enforcement agency and building up the workforce from scratch is no easy task. Recruiting new police officers in today's environment has proven to be difficult even for established law enforcement agencies such as the Los Angeles Sheriff's Department, which I had the privilege to lead, and the Los Angeles Police Department, two of the largest and most prominent agencies in the nation.

In 2019 I set a record by hiring 1,100 deputy sheriff trainees, filling 11 academy classes in a row. There was a lot of work involved, but setting expectations for recruitment, backgrounds, and academy training, and overseeing every phase from start to finish proved to be the deciding factor in successfully hiring so many from our local labor market. Our recruitment slogan was straightforward: "Hometown heroes needed, are you in?"

In order to convert the vision of the MTA's board of directors, working in conjunction with the Public Safety Advisory Committee, will require a collaborative approach, one that can marry ideology with the legal framework within which public safety organizations must operate and provide basic services to the community.

Ultimately it's about keeping the transit community safe, and I firmly believe we can accomplish that as a team, one that places customer experience and evidence at the center of the decision making process. Thank you in advance for your assistance in these matters and I look forward to participating in this selection process.

Sincerely,

Alex Villanueva, DPA  
Former Sheriff, Los Angeles County

AV009868

EXHIBIT 76 - Page 999



# ALEX VILLANUEVA

Los Angeles, CA | 562 754-0885 | [sheriffvillanueva33@gmail.com](mailto:sheriffvillanueva33@gmail.com) |

36-year law enforcement veteran who successfully led the nation's largest sheriff's department during a most turbulent time period in law enforcement, managed a workforce of 17,000 employees, a multi-billion dollar budget, converting a \$101 million budget deficit into a \$74 million budget surplus, hired over 1,500 deputies, all while leading the department through the pandemic and major civil unrest.

## EXPERIENCE

DEC 2018-  
DEC 2022

### SHERIFF, LOS ANGELES COUNTY

Led the Los Angeles Sheriff's Department, overseeing patrol operations of 24 patrol stations spread out over 3115 square miles of Los Angeles County, custody operations of the nation's largest jail system with 17,000 inmates, and provided law enforcement services to the LA Metropolitan Transit Authority, the Los Angeles Community College District, the Los Angeles Superior Court system, in addition to specialized detective, tactical resources, and school resource officers throughout Los Angeles County.

FEB 1986-  
FEB 2018

### SWORN MEMBER OF THE LOS ANGELES SHERIFF'S DEPARTMENT (LASD)

Worked through the ranks of the LASD from deputy assigned to the Inmate Reception Center, then patrol in East Los Angeles, served as Field Training Officer, Academy Staff Instructor, then as a sergeant assigned to Lennox Station, Carson Station, and the Community College Bureau. After a stint at the Academy as a supervisor, served as Lieutenant Watch Commander, Mental Health Liaison to Century Regional Detention Facility, then retired from Pico Rivera Station as the Watch Commander.

SPRING 2006-  
SPRING 2010

### ADJUNT PROFESSOR, CALIFORNIA STATE UNIVERSITY, LONG BEACH

Taught upper division coursework in statistics, criminological theory, corrections, and juvenile justice in the Criminal Justice Department.

## EDUCATION

MAY 2005

### DOCTOR OF PUBLIC ADMINISTRATION, UNIVERSITY OF LA VERNE

Dissertation: Leadership Diversity in Law Enforcement, published in 2005

JUNE 1997

### MASTER OF PUBLIC ADMINISTRATION, CAL STATE NORTHRIDGE

## SKILLS

- Strong knowledge and experience in community policing
- Excellent communication skills, both verbal and written
- Published author and contributor in several public administration academic works
- Ability to work collaboratively in a multi-cultural environment, including speaking/reading/writing fluently in Spanish

## RELATED EXPERIENCE

Graduate of the FBI's National Executive Institute (2022) and the California Military Academy's Officer Candidate School (1988), commissioned as a lieutenant in the California Army National Guard, taught the Incident Command System coursework to LASD executives (2007-2009), combined 10 years' experience between the active US Air Force, California Air Guard, and National Guard

AV009870

# EXHIBIT 77

----- Forwarded message -----

From: Gary Peterson <Gary@publicsectorsearch.com>  
Date: Mon, Feb 24, 2025 at 10:57 AM  
Subject: Screening Interview - LA Metro Chief of Police & Emergency Management  
To: sheriffvillanueva33@gmail.com <sheriffvillanueva33@gmail.com>

Sheriff - Greetings and Congratulations,

You have been selected to participate in a screening interview for the Chief of Police & Emergency Management for the Los Angeles Metropolitan Transportation Authority (LA Metro). My name is Gary Peterson. I am a retired police chief and one of the consultants working on this project. We use the Microsoft Teams platform to schedule the screening interviews.

We will review your career history, education, and training during the screening interview. Please have a copy of your submission in front of you and be prepared to discuss your leadership style, policing philosophy, and practical experience related to the challenges and opportunities outlined in the brochure. We will also discuss your background (e.g., OIS, lawsuits, IAs, etc.) and your internet profile (positive and negative articles and social media). Finally, we will talk about the next steps.

If something arises or you have technical difficulties, I can be reached at 916-622-5323 cell or 916-789-9990 office.

Gary

---

Microsoft Teams Need help?

Join the meeting now

Meeting ID: 298 942 473 898

Passcode: qR3f99nQ

---

Dial in by phone

+1 442-286-0367,,656487982# United States, Escondido

Find a local number

Phone conference ID: 656 487 982#

For organizers: Meeting options | Reset dial-in PIN

---

AV009863

# **EXHIBIT 78**

**(SEPARATELY LODGED WITH COURT)**

# EXHIBIT 79



her side contains important

n below the signature line.

## YOUR SOCIAL SECURITY CARD

**ADULTS:** Sign this card in ink immediately.

**CHILDREN:** Do not sign until age 18 or your first job,  
whichever is earlier.

Keep your card in a safe place to prevent loss or theft.

**DO NOT CARRY THIS CARD WITH YOU.**

Do not laminate.

